

**CCC**  
GROUP

**CODE OF ETHICS IN ADVERTISING  
OF THE CCC GROUP**



# CONTENTS

<b>I</b>	PREAMBLE .....	3
<b>II</b>	GENERAL CONCEPT .....	4
<b>III</b>	KEY PRINCIPLES OF ADVERTISING .....	6
<b>IV</b>	ADVERTISING ADDRESSED TO CHILDREN .....	8
<b>V</b>	ATTITUDE TOWARDS ENVIRONMENTAL PROTECTION .....	9
<b>VI</b>	SPONSORSHIP.....	10
<b>VII</b>	ATTITUDE TO ANIMALS .....	10
<b>VIII</b>	SALES PROMOTION .....	11

## **I. PREAMBLE**

The CCC Group believes it has a responsibility to be a driver of positive change, both globally and within its local communities. Responsible communication as well as responsible sales and marketing of our products are an integral part of this process.

We expect our intermediaries, business partners and all those who act for us and on our behalf to comply with this Code.

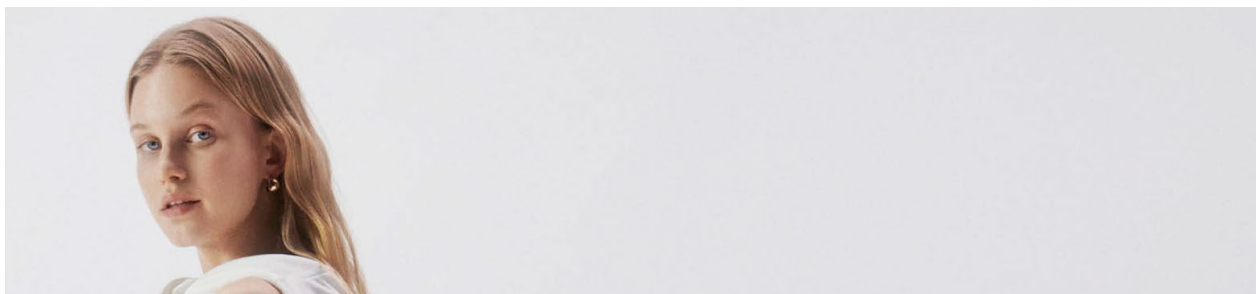
To ensure that our advertising projects are carried out with due respect for the cultural values of a country concerned, we also encourage the adoption and adherence to relevant codes and participation in self-regulatory processes on the local markets where we operate.

Each person responsible for sales or marketing is required to know and observe all of the Group's internal policies, and to follow procedures applicable in their respective country.

All these persons are expected to adhere to the spirit and letter of this Code in their actions, and to pay heed to the opinions of and potential impact of their communications on target audiences, as well as a broader cultural and social context.

This Code applies to all marketing communications under the control of CCC Group companies, whether directly or through intermediaries, business partners, employees, etc.

## II. GENERAL CONCEPT



### **The CCC Group Code of Ethics in Advertising:**

- places emphasis on ensuring that CCC advertising does not mislead its audiences,
- protects audiences from unethical and unfair advertising message content,
- is a set of rules defining what is acceptable in the Group's advertising message content and what is unethical,
- promotes responsible advertising practices and addresses challenges posed by the dynamic market,
- must conform to the laws, principles of decency, facts and accepted rules of fair competition and good commercial practice,
- must be prepared with a proper sense of social responsibility,
- must comply with all the legal regulations and requirements,
- governs all aspects of marketing communications, taking into account the specific nature of the various types of media.

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### **This Code of Ethics in Advertising contains specific provisions prohibiting, inter alia:**

- discrimination on the grounds of gender, religion or nationality,
- use of content encouraging violence,
- abuse of recipients' trust, lack of experience or unawareness,
- violation of human dignity or integrity.

**Standards contained in the CCC Group Code of Ethics in Advertising are derived from the generally accepted principles of ethics and good market practices.**

Advertising activities covered by this Code will be carried out with due diligence, in accordance with good practice and the sense of social responsibility, and in compliance with the principles of fair competition.

The parties to CCC advertising agreements will determine their mutual legal relations so that their provisions are consistent with the Group Code of Ethics in Advertising.

Statements on behalf of the CCC Group may only be made by persons who are authorised to do so and have been trained in the rules of communication.

If someone is invited to speak on behalf of their company, for example, in local media or at a conference, this should be notified to their line manager. If, upon consultation with the Communication and Sustainability Department, the line manager grants their consent, such person is authorised to make a public statement on behalf of CCC.

With regard to private activity on social media, it should be remembered that comments and behaviours may affect how others perceive CCC and the attitudes it finds acceptable.

As the CCC Group builds its market position on the principles of fair play, the practice of criticising competitor products or services should be avoided. One should refrain from making negative comments on social media about the activities of direct competitors or other brands owned by CCC. This also applies to private statements made on social media, especially those related to professional duties and those which may affect CCC and its reputation.

### III. KEY PRINCIPLES OF ADVERTISING



#### **Key principles of advertising**

- CCC advertising may not contain any discriminatory content, particularly on the grounds of race, religious beliefs, gender or nationality.
- Advertising may not encourage violence.
- Advertising may not jeopardise objects of historical or artistic significance.
- Advertising may not abuse recipients' trust, or take advantage of their lack of experience or unawareness.
- The CCC Group will ensure that recipients of CCC advertisements are always aware that a given message is an advertisement.

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**We set great store by the principle of respect. For this reason, in our advertisements or other marketing messages we do not use content that:**

- discriminates against any group of people,
- encourages others to discriminate against any group of people,
- reinforces negative social stereotypes based on, for example, gender, age, health, or skin colour,
- reduces women or men to sexual objects and objectifies them because of sexual attractiveness,
- encourages aggression or unethical attitudes and behaviours that are hurtful to others.

**Advertising may not mislead its recipients, in particular with regard to:**

- important product characteristics, such as properties, composition, methods of manufacture, fitness for a purpose, quantity and place of origin,
- product value, actual price and payment terms,
- terms of delivery, replacement, return, repair and care,
- warranty conditions,
- intellectual and industrial property rights, particularly patents, names, trade marks and industrial designs and models,
- official permits and approvals, awards, medals and certificates of recognition,
- scope of the company's charitable giving.

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CCC comparative advertising may not mislead recipients as to the offered products, trademarks, trade names, or other signage.

CCC comparative advertising may not disparage or ridicule a competitor or its circumstances, putting it or its products in a bad light.

An advertisement may not portray or refer to any individuals, including public figures known for the functions they hold, without obtaining their prior consent, nor may it without their prior consent describe or refer to an item owned by a specific individual in a way that may give an impression of their personal recommendation.

The CCC Group may not use advertising that may create an impression in the recipient that there is no obligation to pay for the product unless it is indeed free of charge.

#### **IV. ADVERTISING ADDRESSED TO CHILDREN**



- CCC advertising addressed to children or young people may not contain any content posing a risk to health or safety.
- Advertising addressed to children or young people may not exploit their natural credulity or lack of experience.
- Advertising addressed to children or young people may not convey the message that owning or using a product will give them a social or psychological advantage over others, or that not owning the product will have the opposite effect.
- Any advertising message that is not directly addressed to children, but because of its form, place and manner of presentation may be viewed by children, but its content may negatively affect their development, is prohibited.
- It is prohibited to broadcast any commercial communications that encourage minors to persuade their parents or other persons to purchase the products or services being advertised.
- It is prohibited to use in advertising the trust minors place in their parents, teachers and other persons.
- Advertising that unreasonably shows minors in dangerous situations is prohibited.

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#### **In particular, CCC advertising will not include:**

- content posing a risk to their health or safety,
- scenes physical or psychological violence,
- scenes showing problematic family relationships, such as child neglect, child acting as an adult, child's negative attitude towards adults,



- message that directly or indirectly undermines the authority of parents or legal guardians,
- scenes encouraging conflict,
- the motive of excessive consumerism and consumerist lifestyle as the overriding value in life.

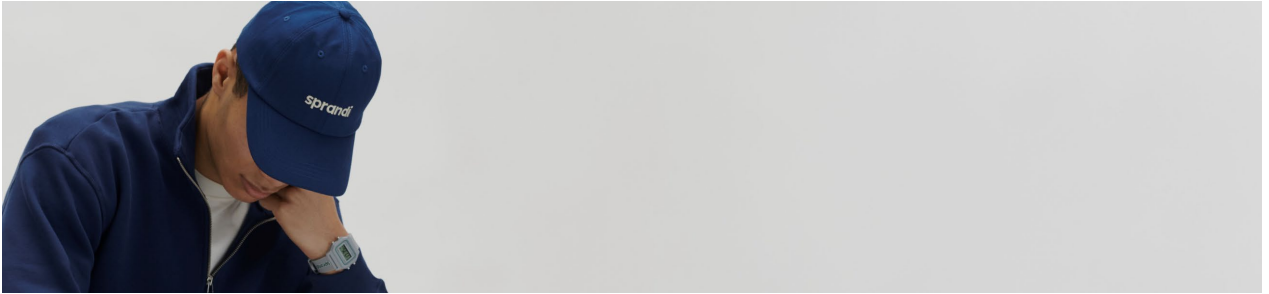
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## **V. ATTITUDE TOWARDS ENVIRONMENTAL PROTECTION**



- CCC advertising may not undermine public trust in properly implemented environmental protection initiatives.
- Advertisements may not contain messages that could mislead consumers about environmental protection, including in particular, by misinforming about a product’s characteristics or the Group’s environmental protection efforts.
- Advertisements containing a general phrase, especially ones such as “environmentally friendly” or “environmentally safe”, may not be misleading. Information describing the product’s environmental effect must be available at the point of sale or attached to the product, or be made available to the beneficiary in a publicly accessible manner.

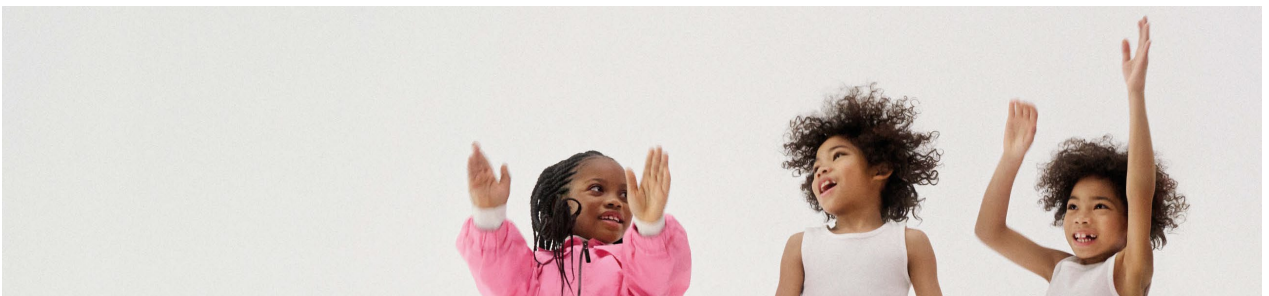
## VI. SPONSORSHIP



- Information about the CCC Group's event sponsorship must be clearly stated in marketing communications and may not deviate from good commercial conduct.
- Events sponsored by the CCC Group may not create adverse environmental impacts.
- Events sponsored by the CCC Group must be compliant with generally accepted principles of ethics, morals and social norms.

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## VII. ATTITUDE TO ANIMALS



- CCC advertising may not promote attitudes questioning animal rights.
- Animal images in CCC advertising should be used in moderation so that animals are not presented in a way implying a possibility of their inhumane treatment.

## **VIII. SALES PROMOTION**



- CCC Group sales promotions may not be designed or carried out in a way that misleads recipients.
- The design and conduct of sales promotions may not provoke or allow aggressive or illegal behaviour, or otherwise contravene social norms.
- CCC sales promotions may not abuse the trust of recipients or exploit their potential unawareness or lack of experience.
- Sales promotions should be organised in such a way that the beneficiary can easily understand the terms of the relevant offer. Particular effort should be made to ensure that a promotional offer does not overstate the additional benefit to be gained while obscuring the price of the main product.
- If personal data of individuals is collected as a result of CCC sales promotion, the beneficiary must be expressly informed of this fact and of the extent to which such data is processed.
- The collection, storage and use of data must be compliant with the Personal Data Protection Act.



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