



# CCC GROUP ENVIRONMENTAL POLICY



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## **I. INTRODUCTION**

In order to develop its business, the CCC Group uses various types of capital, including natural capital. Natural capital is the world's natural resources, including minerals, soil, air, water and all living creatures.

This Policy sets out the priorities and key commitments to be followed by the CCC Group in using natural capital and managing its relations with the natural environment.

Priorities in using natural capital:

1. We reduce environmental damage and the use of natural resources, primarily non-renewable resources.
2. We compensate for environmental damage where it cannot be reduced.
3. We encourage and support our business partners, suppliers along the supply chain, and customers in improving their use of natural capital in partnership with CCC and through our products.

We apply the hierarchy of priorities shown above, that is we first seek to apply the first priority, and then the second and third ones.

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### **I.1 Purpose**

The purpose of this Environmental Policy is to define the framework within which the CCC Group will manage its relations with the natural environment and methods of using natural capital.

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### **I.2 Scope**

This Policy applies to all CCC Group companies regardless of their business profile. It can be adopted and developed by individual CCC Group companies, which are free to further improve the best practices, tailored to their own business profile.



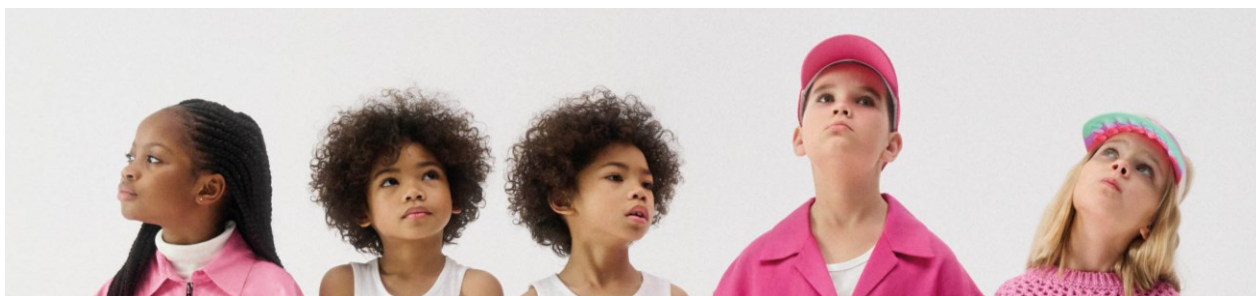
### **I.3 Environmental Policy and other regulations**

The objectives regarding the use of natural capital within a given period are defined in the CCC Group's Sustainability Strategy.

The principles of the Environmental Policy are established with consideration of, among others, Regulation (EU) 2020/852 of the European Parliament and of the Council (commonly referred to as the Taxonomy Regulation) and the Technical Screening Criteria established under this Regulation.

The Environmental Policy serves as the fundamental document, reinforced by other related documents in force within the CCC Group, in particular:

- Supplier Code of Conduct
- Chemical Management Policy
- Principles and Best Practices of Cooperation with CCC Group Suppliers



## **II. APPLICATION**

### **II.1 Top management**

The Environmental Policy is adopted by a resolution of the President of the Management Board.

The Environmental Protection Department is the main department responsible for the implementation of the Environmental Policy and waste management.

At least once a year, the CCC Group Management Board evaluates the functioning of the Environmental Policy based on information provided by the areas responsible for environmental protection, including:

- **Environmental Protection** – waste management, supervision of environmental goals implementation, cooperation with other departments, and providing data for ESG indicators;
- **Administration** – management of headquarters properties and energy efficiency;
- **Logistics** – logistics and warehouse solutions, packaging;
- **Sales** – low-emission retail stores, circular solutions in downstream;

- **Product** – cooperation with suppliers to reduce negative environmental impact, eco-design;
- **Sustainability** – reporting on the implementation of environmental goals included in the Sustainability Strategy.

The CCC Group Management Board makes decisions on the need to introduce changes to the Environmental Policy.

At least once a year, the CCC Group Management Board presents the Supervisory Board of the CCC Group with information on the status of the Environmental Policy implementation.

## II.2 Organisational units

This Environmental Policy is to be implemented by all the CCC Group companies.

The application of this Environmental Policy is supervised operationally by the responsible areas.

As part of its operations, the Internal Audit function may verify the correctness of the process, controls and responsibilities indicated in this Environmental Policy.

## II.3 Improvement

The Management Board of the CCC Group is responsible for decisions on reviewing and revising this Environmental Policy.

Responsible areas are responsible for planning and conducting, in cooperation with the HR Department, of training sessions and educational programmes for employees of all the CCC Group organisational units involved in implementing this Environmental Policy

The CCC Group will engage in constructive dialogue with stakeholders, including identifying and taking into account their opinions and concerns in the planning and implementation of projects.



### III. ENVIRONMENTAL POLICY COMMITMENTS

This section presents the commitments made in this Environmental Policy. With regard to each of the commitments:

- the scope of its application is clarified;
- examples are provided of activities carried out by individual organisational units as part of a given commitment.

The examples of activities do not represent an exhaustive list, i.e. the organisational units independently and in cooperation with the responsible areas specify the activities they carry out to realise the commitment.

#### III.1 Climate change prevention

Activities implemented to mitigate climate change include:

- generation and storage of energy from low- and zero-carbon sources;
- improving energy efficiency;
- developing climate-neutral mobility;
- switching to the use of sustainably sourced renewable materials;
- preventing deforestation, restoration of forests, afforestation, sustainable management and restoration of croplands and grasslands, regenerative agriculture.

The CCC Group will identify and assess climate-related risks for ongoing projects and appropriately implement adaptation and mitigation measures in response to climate change.

The commitment to climate change prevention is realised mainly through the following activities:

- eliminating unnecessary energy consumption in retail stores;
- continuously improving the energy efficiency of retail stores, including in-store equipment;
- applying the energy efficiency criterion when selecting a retail location (a building in which a retail store is to be located, e.g. a shopping centre) and expecting partners (lessors) to bring those buildings into compliance with the Technical Screening Criteria (for new or existing buildings, as the case may be);
- construction of new and renovation of existing buildings of the CCC Group will be carried out to meet the Technical Screening Criteria;

- the selection of logistics partners will depend on their meeting the low-carbon transport criterion;
- low-and zero-carbon means of transport will be preferred for transporting goods from suppliers to the CCC Group (inbound logistics), in order to ultimately opt out of air transport;
- employees will travel on business by train or other means of public land transport; Electric or hybrid vehicles will be chosen for car travel; Air transport will be reduced to a minimum and chosen only where there is no alternative viable option;
- renewable materials from sustainable sources will be preferred when designing products and selecting goods;
- plant-based and animal-based raw materials will be monitored on an ongoing basis; Once monitoring is put in place, business partners will be expected to use raw materials from regenerative agriculture, and raw materials from suppliers contributing to deforestation will no longer be purchased.

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### **III.2 Climate change adaptation**

Activities implemented to adapt to climate change include:

- introducing solutions to reduce the risk of negative climate impacts.

The commitment to climate change adaptation is realised mainly through the following activities:

- construction of new and renovation of existing buildings of the CCC Group will be carried out so they can withstand sudden and long-term effects of climate change (such as higher frequency of sudden weather changes, prolonged heat waves, droughts, etc.).

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### **III.3 Protection of water and marine resources**

Activities implemented to protect water and marine resources include:

- preventing urban and industrial wastewater discharges;
- protecting water resources against newly emerging microplastic pollution;

- protecting water resources intended for human consumption by ensuring that they are free of microorganisms, parasites and substances that constitute a potential danger to human health;
- improving water management efficiency.

The commitment to protection of water and marine resources is realised mainly through the following activities:

- regular monitoring of the impact of the CCC Group's business partners on water resources, particularly where they use raw materials that require significant amounts of water for manufacturing and processing;
- applying supplier selection criteria that relate to their impact on water resources;
- promoting sustainable (circular) water use practices among suppliers;
- analysing artificial materials used in the production of goods in terms of their impact associated with microplastic pollution;
- gradual reduction and then elimination (by business partners) at the design and production stage of materials causing microplastic pollution.

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### **III.4 Transition to a circular economy**

Activities implemented to drive the transition to a circular economy include:

- reducing the consumption of primary raw materials and increasing the use of by-products and secondary raw materials;
- increasing resource use efficiency;
- increasing the durability of products, including their repairability, upgradability or reusability, especially at the design and production stage;
- extending the use of products, including through reuse, design for longevity, repurposing, disassembly, remanufacturing, upgrades and repair;



- increasing the recyclability of products, including the recyclability of individual materials contained in products, and replacing and reducing the use of non-recyclable materials, in particular in designing and manufacturing activities;
- preventing waste generation.

The CCC Group actively implements the principles of a circular economy, undertaking actions aimed at reducing environmental impact and using resources efficiently. As part of these efforts:

- We implement circular design principles across all design processes within the CCC Group and apply them as criteria when selecting merchandise;
- We analyze, evaluate, and, where possible, apply and implement business models that support the CCC Group's transformation into a circular organization;
- We design and furnish retail stores with furniture, accessories, and equipment that can be reused, disassembled, or recovered for materials.

In terms of PRODUCT, the CCC Group commits to:

- Designing and working with business partners to manufacture products in a way that makes them repairable, including ensuring access to appropriate spare parts;
- For non-repairable products – ensuring that they are made exclusively from materials suitable for reuse, recycling, or effective biodegradation;
- Providing customers with access to product care and maintenance solutions, while also informing and supporting them in responsible product use to extend product lifespans in accordance with circular economy principles.

In terms of PACKAGING, the CCC Group undertakes actions, commitments, and environmental goals that include:

- Reducing the number and weight of packaging materials used at all stages of logistics – from suppliers to the CCC Group, within the Group (to retail stores), and to end customers;
- Designing packaging in a sustainable way, minimizing volume and weight, and reducing environmental impact;
- Developing innovative reusable packaging solutions that are more efficient and environmentally friendly, increasing their share in the Group's offering;

- Monitoring and managing packaging-related risks, ensuring compliance with the PPWR regulation and international best practices;
- Fostering internal collaboration within the Group to ensure transparency and accountability in packaging management and legal compliance.

The CCC Group's packaging goals:

- Striving to ensure that by January 1, 2030, all packaging placed on the market is fully recyclable;
- Promoting selective collection and recycling of packaging to meet designated environmental targets;
- Maintaining a high level of packaging recycling and continuously monitoring progress in this area, including achieving the EU requirement of recycling at least 70% of packaging waste by 2030;
- Systematically monitoring and reporting progress on packaging-related objectives to support continuous improvement and regulatory compliance.

### **III.5 Pollution control and prevention**

Activities implemented to control and prevent pollution include:

- preventing or, where impracticable, reducing emissions of pollutants into the air, water or soil;
- preventing or minimising any adverse impact on human health and the environment of the production, use or disposal of chemicals.

The commitment to pollution control and prevention is realised mainly through the following activities:

- analysing all materials used in the CCC Group's products and goods for harmful substance content;
- ensuring due diligence (at the stages of design, procurement and manufacture by business partners) in preventing the marketing of products and goods containing substances of very high concern.

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### **III.6 Protection and restoration of biodiversity and ecosystems**

Activities implemented to protect and restore biodiversity and ecosystems include:

- nature and biodiversity conservation, prevention of environmental and biodiversity degradation, protection and restoration of ecosystems;

- sustainable land use and management, including adequate protection of soil biodiversity, land degradation neutrality and the remediation of contaminated sites;
- sustainable agricultural practices, including practices contributing to enhancing biodiversity or preventing the degradation of soils and other ecosystems, deforestation and habitat loss;
- sustainable forest management, including practices contributing to enhancing biodiversity and preventing deforestation.

The CCC Group implements appropriate deforestation risk assessment procedures, and has established relevant goals, strategies, and procedures related to due diligence declarations in this area.

The commitment to protection and restoration of biodiversity and ecosystems is realised mainly through the following activities:

- introduction and regular monitoring of the sources of raw materials and materials used in production by the CCC Group's business partners in terms of their impact on biodiversity and ecosystems;
- increasing the share of plant-based and animal-based raw materials from sustainable and regenerative agriculture;
- causing business partners to stop using raw materials from suppliers who contribute to deforestation and land degradation.
- Implementing and adhering to due diligence procedures in accordance with the requirements set out in the EUDR regulation;
- Including, in the supplier selection process, the criterion of using raw materials that do not contribute to deforestation or land degradation;
- Obtaining from suppliers information and documentation confirming that the materials and raw materials supplied do not cause deforestation, were produced in compliance with the applicable laws of the country of origin, and are covered by a due diligence statement;
- Cooperating with suppliers and business partners on the sustainable management of raw materials, with particular emphasis on those sourced from areas with a high risk of deforestation;
- Reducing the use of raw materials and products originating from high-risk countries as defined by the EUDR.





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