

CCC

THE CCC GROUP CODE OF ETHICS



| | | | | | |
|---|----|-----|----|---|----|
| I | II | III | IV | V | VI |
|---|----|-----|----|---|----|

CCC

SECTIONS

- I. INTRODUCTION
- II. RESPECT FOR VALUES
- III. REPORTING VIOLATIONS
- IV. COMMUNICATING
THE CONTENTS OF THIS CODE
- V. MONITORING AND UPDATING
MECHANISM
- VI. APPENDICES



INTRODUCTION

| | | |
|-----------|--|----------|
| 1. | LETTER FROM THE PRESIDENT OF THE MANAGEMENT BOARD | 5 |
| 2. | PURPOSE AND SCOPE OF APPLICATION OF THE CODE OF ETHICS | 6 |
| 3. | OUR MISSION, VISION AND VALUES | 7 |
| 4. | COMMITMENT TO COMPLY WITH THE BASIC LEGAL STANDARDS | 7 |
| 5. | YOUR RESPONSIBILITIES | 7 |

CCC

1. LETTER FROM THE PRESIDENT OF THE MANAGEMENT BOARD

Dear Employees,

we present to you this Code of Ethics of the CCC Group, which is the fundamental document on ethics at our company. It lays down a set of principles, values and attitudes that we, as an organisation, follow every day in our internal relations and in relations with our partners. The provisions of this Code of Ethics apply to our conduct in the economic, social, cultural and environmental areas.

When developing this Code, we adopted the internationally recognised and respected standards on human and labour rights as the underlying framework. The CCC Group wants to develop in accordance with the principles of responsibility and sustainability, and therefore we are committed to act in accordance with the Universal Declaration of Human Rights, and respect for ethical standards is one of the priority areas for the Management Board.

We believe that it should be the bedrock of any modern organisation which, by its actions, impacts not only the people it employs, but also the business environment, local communities and the natural environment. It is our responsibility to look after the rights, welfare and advancement of all these groups.

Principles of ethical conduct apply equally to all of us and each of us has the duty to respect them. By combining professionalism and observance of the standards of ethics in our daily activities we will be able not only to build a friendly working environment, but also perform even better in terms of business results. The Management Board are open to dialogue and cooperation on any challenges that may occur. Also, each and every employee may use the assistance of the Ethics Officer, who offers support as regards compliance with the values and principles presented in this Code.

Since the beginnings of the CCC Group, we have made every effort to ensure that it is managed in an ethical manner by building mutual relations based on respect and trust. Adoption of this Code will help us, as an organisation, to jointly further this ethos and ensure the highest standards of business ethics in our conduct. I believe that the success of this project depends on our joint commitment.

Thank you for your everyday work and contribution to our common goals. It is thanks to you that the CCC Group is getting better every day and reinforcing its position as an industry leader!

Yours faithfully,



Marcin Czyczerski

President of the Management Board

CCC

2. PURPOSE AND SCOPE OF APPLICATION OF THE CODE OF ETHICS

PURPOSE

The CCC Group Code of Ethics (the “Code”) defines the basic principles, guidelines on conduct and behaviour, and desired attitudes to be applied across our Group. In complying with this Code, any individual acting on behalf of CCC acts in accordance with our values, the applicable laws, and generally accepted standards of business ethics.

This Code of Ethics defines the most important values that enhance the process of creating an ethical work environment and building mutual trust at CCC. The primary objective of this Code is to ensure compliance with the requirements of the Polish and international laws. It is also intended to set out a clear framework for dealing with any identified cases of violation of the principles of ethical conduct. This document refers to other internal policies, which supplement it and together with this Code constitute a complete set of principles of ethical conduct applicable at the CCC Group.

SCOPE OF APPLICATION

The provisions of this Code of Ethics apply to all individuals working for a CCC Group company, irrespective of the legal form of their employment relationship; i.e. the Group employees of in any position or function. The CCC Group works on an ongoing basis to develop procedures ensuring ethical business conduct. We make every effort to ensure that third parties, including our suppliers and trading partners, observe values consistent with those set out in this Code in their activities.

RESPONSIBILITY FOR THE CODE OF ETHICS

The person responsible for overseeing the contents of this Code, implementing the Code communication procedures, and supervising the process of handling reports of violations of this Code is the **Ethics Officer, assisted in this role by the Compliance Officer.**

Subsidiaries and affiliates making up the CCC Group may appoint their local **Representatives of the Ethics Officer.**

ELECTION AND RESPONSIBILITIES OF THE ETHICS OFFICER

In the first year of operation of the Ethics Officer function, the Ethics Officer will be elected from among the staff of the HR area. In the following years, in order to build awareness of ethical values, the Ethics Officer will be elected by competition.

The responsibilities of the **Ethics Officer** include monitoring compliance with this Code of Ethics, reviewing reported violations of ethical values, putting forward proposals to revise the Code of Ethics, and organising and overseeing training on ethics and human rights.

ELECTION AND RESPONSIBILITIES OF A REPRESENTATIVE OF THE ETHICS OFFICER

In the first year of operation of this Code of Ethics, a Representative of the Ethics Officer is elected by a decision of the governing bodies of the entity in which they are to be appointed. The person serving as the Representative should be elected from among the staff of the HR area. In subsequent years, the Representative will be elected by competition.

CCC

The responsibilities of a Representative of the Ethics Officer include local monitoring of compliance with this Code of Ethics, review of reported violations of ethical values, supervision of the conduct of training on ethics, coordination of the implementation of regulations on ethics at the individual company level, and submission of half-year reports on their activities to the Ethics Officer.

3. OUR MISSION, VISION AND VALUES

| | | |
|----------------------------|----------------------------------|--------------------------|
| CUSTOMER AND PRODUCT FOCUS | DYNAMISM, ENTHUSIASM, DEDICATION | OPENNESS AND COOPERATION |
| | RESPONSIBILITY | PERSONAL DEVELOPMENT |

4. COMMITMENT TO COMPLY WITH THE BASIC LEGAL STANDARDS

The provisions of this Code reflect the principles agreed in documents that define the most important generally recognised 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 Organisation) Conventions
e.g. Convention No. 29 – Forced Labour Convention
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights

We follow the abovementioned standards and apply ethical guidelines in our operations

5. YOUR RESPONSIBILITIES

If you are in the group of persons specified in the ‘Scope of Application’ sub-section above:

- **Read** this Code and the violation reporting (whistleblowing) procedure
- **Avoid any conduct that is in conflict** with the values and principles described in this Code
- **Report** any identified violations of this Code
- **Support** investigation in the case of possible violations of this Code

In addition, the management should promote CCC's values and ethical standards through their own example and conduct consistent with the principles contained in this Code of Ethics.





RESPECT FOR VALUES

| | | |
|-------------|--------------------------------------|-----------|
| 1. | RESPECT FOR HUMAN RIGHTS | 12 |
| 1.1. | Protection against discrimination | 12 |
| 1.2. | Prevention of workplace bullying | 12 |
| 1.3. | Workplace bullying vs discrimination | 13 |
| 1.4. | Prevention of sexual harassment | 13 |
| 1.5. | Respect for freedom of association | 14 |
| 1.6. | Prohibition of forced labour | 15 |
| 1.7. | Prohibition of child labour | 15 |
| 2. | INFORMATION SECURITY | 15 |
| 3. | SAFE WORKPLACE | 15 |
| 4. | ANTI-CORRUPTION | 16 |
| 5. | FAIR COMPETITION | 17 |
| 6. | RELATIONS WITH EXTERNAL STAKEHOLDERS | 17 |
| 7. | ENVIRONMENTAL RESPONSIBILITY | 18 |
| 8. | CONFLICTS OF INTEREST | 18 |
| 9. | PRODUCT SAFETY | 19 |

CCC

This Section describes the values that every persons to whom this Code applies is required to respect and protect. The values follow directly from the CCC Group's mission and vision, as well as from the commonly accepted ethical standards and regulations.

Below you will find definitions and descriptions of each value translated into competences that substantially reflect those values in everyday work. In this respect, they are also a part of the employees' Development Reviews, which are monitored and verified on an ongoing basis throughout the year and used to set the examples of desired conduct within the organisation.

CUSTOMER AND PRODUCT FOCUS

We act with the satisfaction of our colleagues and customers in mind. We make an effort to meet the expectations of internal and external customers. We set high standards of cooperation with internal customers. We perceive our colleagues as internal customers.

DYNAMISM, ENTHUSIASM, DEDICATION

We listen to each other and engage our potential to create innovative projects. We encourage commitment and innovative ideas through career development and succession programmes. We develop managers to effectively manage, inspire and engage their teams

OPENNESS AND COOPERATION

We adapt to the changing environment. We encourage thinking in terms of solutions rather than problems. We take an active part in the change implementation process. We work as a team towards a common goal. We engage with others towards a common goal and engage others to find solutions together. We strive for the best solution while taking into account the views of others without imposing our own opinions.

RESPONSIBILITY

We have the knowledge and experience to complete tasks efficiently. We know and follow the procedures and regulations applicable in our positions. We take responsibility for the consequences of our actions, especially in difficult situations.

PERSONAL DEVELOPMENT

We support others with our expertise and skills through our personal development. We offer our knowledge and are happy to share it with colleagues. We seek information and disseminate it for company and team use. We expand our knowledge and take care to ensure our ongoing advancement.

In the case of those principles of ethical conduct whose violation has a particular impact on workplace safety, the definitions are followed by examples and a reminder that violations can be reported.

If you have witnessed/been are affected by a violation of the principles of ethical conduct, you can report it using the tools described in the **REPORTING VIOLATIONS** section.

CCC

1. RESPECT FOR HUMAN RIGHTS

1.1. Protection against discrimination

We create a discrimination-free work environment. We conduct employee evaluation procedures in a fair manner and with respect for the employee's dignity. Recruitment, employment and termination decisions are made on the basis of objective criteria. We provide employees with equal pay and development opportunities.

WHAT IS DISCRIMINATION?

Discrimination occurs where a person is treated less favourably than someone else would be treated in a comparable situation because of such characteristics as the person's sex, race, ethnic origin, nationality, religion, religious denomination, belief, disability, age or sexual orientation.

WHAT ARE THE POSSIBLE FORMS OF DISCRIMINATION IN THE WORKPLACE?

Discrimination may affect you either when you are already an employee or when you have just applied for a job .

One example of discrimination at the stage of recruitment may be asking the candidate about their marital status and family planning in the context of assessing their availability.

One form of discrimination is pay inequality. It is a situation where people with similar seniority, experience, education and responsibilities are paid differently on the grounds of age, gender or other criteria.

EQUAL OPPORTUNITIES

We provide our employees with equal access to development and promotion opportunities and strive to ensure equal pay. The objectives in this area are an elementary component of our Sustainable Development Strategy.

1.2. PREVENTION OF WORKPLACE BULLYING

At the CCC Group, we seek to create relations based on professionalism and mutual respect. Workplace bullying is unacceptable and we make a commitment to counteract it.

WHAT IS WORKPLACE BULLYING?

Workplace bullying is a pattern of conduct or behaviour in relation to or against an employee that involves persistent and long-term harassment or intimidation of the employee, and which results in the employee doubting their professional worth and/or has the purpose or effect of humiliating or ridiculing the employee, ostracizing the employee or excluding them from the team.

According to the ILO, workplace bullying is repeated offensive behaviour through vindictive, cruel, malicious or humiliating attempts to undermine an individual or group of employees.

CCC

WHAT ARE THE POSSIBLE EXAMPLES OF WORKPLACE BULLYING?

Do you feel that your supervisor or colleague treats you worse than others and any interaction with them makes your self-esteem go down significantly? This may be a manifestation of workplace bullying. Remember that a specific conduct must be repeated and occur over a long period of time to be considered bullying.

Examples include regular acts of psychological violence, situations where an employee is frequently assigned unrealistic tasks, or the employee's qualifications are undermined in a persistent and humiliating manner. Bullying may also take the form of regular spreading of malicious rumours to harm a given person.

REMEMBER! To qualify as workforce bullying a specific conduct must satisfy all the criteria, i.e.:

- It is **persistent**
- It is **long-term** in nature ('long-term' meaning at least six months or so)
- It causes **low professional self-esteem** of the employee
- It is intended to **humiliate** or **ridicule** the employee
- It is intended to **ostracize** the employee or **exclude** them from the team

If you have witnessed or suffered bullying, you can report it using the tools described in the **REPORTING VIOLATIONS** section.

For detailed information on our anti-bullying rules, see the CCC Group Equal Treatment, Anti-Discrimination and Anti-Bullying Rules.

1.3. Workplace bullying vs discrimination

To be considered a victim of discrimination an individual must suffer unequal treatment because of any of the protected characteristics (listed in sub-section 1.1). The definition of workforce bullying does not refer to protected characteristics. Only an employee employed on the basis of an employment contract (pol. *umowa o pracę*), appointment (*mianowanie*) or cooperative employment contract (pol. *spółdzielcza umowa o pracę*) may be considered a victim of workplace bullying. A person employed under a civil-law contract (pol. *umowa cywilnoprawna*) may assert claims under the provisions of the Polish Civil Code concerning infringement of personal rights. Bullying must also meet the five criteria listed in sub-section 1.2. For instance, **workplace bullying** must represent a repeated conduct. Discrimination may be a single incident.

1.4. Prevention of sexual harassment

We take steps to prevent and counteract sexual harassment. Sexual harassment is a type of conduct that violates human dignity. The CCC Group seeks to provide a safe and comfortable environment for the employees and offers assistance in resolving conflicts.

WHAT IS SEXUAL HARASSMENT?

Sexual harassment is any unwanted behaviour of a sexual nature, whether verbal, non-verbal, or physical, which

CCC

has the purpose or effect of violating the dignity of a person, in particular where it involves creating an atmosphere of intimidation, hostility, degradation, humiliation or offense. The important characteristics of conduct that qualifies as sexual harassment are being unwanted and unwelcome.

WHAT ARE THE POSSIBLE FORMS OF SEXUAL HARASSMENT AT THE WORKPLACE?

Be aware of the different forms that sexual harassment can take. It may be verbal, a case in point being an offer of sex in exchange for benefits such as promotion or pay rise.

A non-verbal form of sexual harassment will be, for example, intrusive and unwanted presentation of erotic content, or persistent staring at a person.

Sexual harassment may also take a physical form. This will include any unwanted touching and coerced or forced sexual contact.

For detailed information on our anti-discrimination rules, see the CCC Group Equal Treatment, Anti-Discrimination and Anti-Bullying Rules.

1.5. Respect for freedom of association

We respect freedom of association. We ensure that our employees can exercise their right of association by joining trade unions.

WHAT IS FREEDOM OF ASSOCIATION?

Freedom of association is an individual's right to join others in order to establish structures that will support achievement of a common collective goal. It includes, in particular, the right to form trade unions to protect the interests of their members. Freedom of association is guaranteed under many acts of law, including the Constitution of the Republic of Poland and the Charter of Fundamental Rights of the European Union.

WHAT IS A VIOLATION OF FREEDOM OF ASSOCIATION?

Examples of violations in this area include:

- **discouraging** workers from joining trade unions
- **intimidating** employees and anti-union behaviour
- **promoting** employer-dominated structures and worker engagement mechanisms and unfair labour practices
- **refusing** to negotiate in good faith
- **effect** of short-term contracts and other forms of temporary contracts and informal employment on employees' ability to organise themselves into unions
- **systematic** or organised objection and hostility of the employer towards trade unions

CCC

1.6. Prohibition of forced labour

We do not tolerate forced or compulsory labour.

WHAT IS FORCED LABOR?

In accordance with ILO Convention No. 29, 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 himself voluntarily. The following are examples of work or service that qualifies as forced labour: provision of work or services involving exploitation, or coerced by violence, threat, deprivation of freedom, demand to work off debt, retention of an identity document, travel document, or document authorising a foreigner to stay in the territory of the Republic of Poland, non-payment of remuneration, or any other violation of employee rights.

1.7. Prohibition of child labour

We do not use child labour.

We expect our suppliers to refrain from employing children and tolerating child labour.

In accordance with ILO Convention No. 138 – Minimum Age Convention, the minimum age of a supplier’s employee may not be less than the age of completion of compulsory schooling and, in any case, may not be less than 15 years. **The Charter of Fundamental Rights states that the employment of children is prohibited.**

Young people admitted to work must have working conditions appropriate to their age and be protected against economic exploitation and any work likely to harm their safety, health or physical, mental, moral or social development or to interfere with their education.

2. INFORMATION SECURITY

We protect and safeguard against unauthorised access any information of economic value the disclosure of which could be harmful to the Group. We only use confidential information to perform job duties that require access to such information. We are aware that providing or using confidential information may result in legal sanctions. We protect not only confidential information but also sensitive information, personal data and any material information in our possession.

For detailed rules on the security of data, including personal data, at the CCC Group, see the **CCC Group Rules on IT and Personal Data Carriers Security** and the **CCC Group Personal Data Protection Policy**.

3. SAFE WORKPLACE

We make sure that every individual employed at the Group is safe while performing their duties. We have zero tolerance for disregarding basic health and safety at work rules and we help to promote them. Occupational health and safety is a set of legal regulations and research, organisational and technical measures aimed at

CCC

creating working conditions under which the employees can perform their work productively without being exposed to an unreasonable risk of accident or occupational disease and undue physical and mental stress.

BASIC EMPLOYEE DUTIES

The following are basic employee duties as regards compliance with the OHS rules:

- **know the regulations** and rules on occupational health and safety, participate in OHS training and instruction, and take the required examinations
- **perform work** in accordance with the regulations and rules on occupational health and safety, and comply with any OHS-related orders and instructions of superiors
- **ensure good working order** of all machines, devices and tools, and take care to maintain good order at the workplace
- **use collective protection equipment** and any personal protection equipment given to the employee, as well as work clothing and shoes, in accordance with their intended use
- **undergo initial**, periodic and follow-up medical examinations and other recommended medical examinations, and comply with medical instructions
- **promptly notify** the superior of any accident or threat to human life or health identified at the workplace, and warn co-workers and any other persons in the area of danger about the threat
- **co-operate with the employer** and superiors in the fulfilment of duties concerning health and safety at work

If you have witnessed a violation of OHS regulations, report it to your supervisor or use the Whistleblowing Mechanism (Section 3.). Any breach of OHS rules may give rise not only to serious legal consequences but may also pose a threat to your and your colleagues' life and health.

You will receive full information on the CCC Group's OHS rules during training. For our detailed policy on this subject, see ► [LINK](#) ◀



4. ANTI-CORRUPTION

We have a zero tolerance policy for corruption. For detailed rules and guidelines on conduct in the area of anti-corruption, see the CCC Group Anti-Corruption Code ► [.corporate.ccc.eu/ethics](https://corporate.ccc.eu/ethics) ◀



HOW DO WE DEFINE CORRUPTION?

Corruption means promising, offering, giving, soliciting, demanding or accepting by any person, directly or indirectly, any benefit, whether financial, personal or otherwise, for that or any other person, or accepting an offer

CCC

or promise of any of the foregoing in return for an act or omission to act in the exercise of a public function or in the course of business.

KEY RULES

Employees are required to respect the following rules:

- • **do not offer** or give any financial or personal benefits
- • **do not accept** any financial or personal benefits
- • **refuse** to accept any financial or personal benefits
- • **do not induce** anyone to give any financial or personal benefits
- • **promote** ethical and transparent conduct among
- **independent contractors** and trading partners
- • **refrain** from any activity that could expose a CCC Group company to the risk of non-compliance with anti-corruption rules
- • **report** any suspicions or indications of corrupt practices

If you want to report any corruption issue, please refer to the reporting procedure described in the **CCC Group Anti-Corruption Code**.

5. FAIR COMPETITION

We set ourselves ambitious goals and strive to achieve them. We see opportunities for growth and we act on them, but always with due regard to the principles of fair competition. We never enter into any formal or informal agreements with our competitors that restrict trade or exclude other players from the market. In any contacts with our competitors, we exercise caution and avoid questionable conduct. We do not seek or use confidential information on our competitors or proprietary information of our competitors or third parties.

6. RELATIONS WITH EXTERNAL STAKEHOLDERS

We build value together with our stakeholders. We seek to ensure transparency of information and consider the opinions of our stakeholders when developing our product. In relations with the stakeholders we are guided by the principles underpinned by the CCC Values.

CUSTOMERS

In relations with the CCC Group customers, the persons to whom this Code applies should maintain the highest standard of personal conduct and protect the company's image. The persons to whom this Code applies should provide customers with true and reliable information about the company's products.

CCC

SUPPLIERS

In relations with our suppliers, the persons to whom this Code applies should ensure that they remain impartial and objective, and should avoid any situations that might indicate corruption or a conflict of interest. Contracts with suppliers should be executed in accordance with applicable procedures. Detailed rules applicable to the CCC Group suppliers are defined in the Supplier Code of Conduct.

The rules for accepting and giving gifts are defined in the CCC Group Anti-Corruption Code.

7 ENVIRONMENTAL RESPONSIBILITY

We pay attention to the natural environment in any action we take . Climate change is a global and individual challenge, which is also tackled by everyone in the workplace. The CCC Group is committed to complying with applicable environmental legislation. Our approach to managing environmental impacts is built on globally recognised policies, including in particular the UN Sustainable Development Goals, the Paris Agreement, and the EU Taxonomy.

The Group's environmental impacts are assessed and optimised on an ongoing basis as part of the CCC Group Sustainable Development Strategy. Environmental responsibility is one of the pillars of our Strategy. Our strategic objectives are subject to monitoring and regular review.

We also expect our suppliers to apply the highest standards of environmental compliance in their operations.

8 CONFLICTS OF INTEREST

We avoid situations where our personal interests may conflict with those of the Group.

We consider an employee to be in a situation of conflict of interest when any decisions the employee makes within the scope of their responsibilities are affected by their personal or financial interest, or an interest of another individual or entity, especially a competitor, which is contrary to the interest of the Company or companies of the CCC Group. A conflict of interest is also a situation where a personal or financial interest of an employee (or an employee's close person) is in conflict with the Company's interest.

The personal interests of an employee also include interests of the employee's close persons (such as persons related by blood or marriage, life partners, other cohabitating persons) or persons with whom the employee has a close non-professional relationship.

A competitor means an entity engaged in the production of or trading in footwear and handbags, whether on a retail or wholesale basis.

OBLIGATION TO REPORT CONFLICTS OF INTEREST

Conflict of interest processes are coordinated by the Compliance Officer. Employees who are, or believe that they may be, in a conflict of interest situation should immediately report this to their line manager, Internal Auditor or, in justified cases, also the President of the Management Board.

CCC

Conflicts of interest are to be reported using a questionnaire which must be submitted by every employee within 14 days of start of employment. The conflict of interest declaration must be submitted to the Compliance Officer, who maintains a record of conflicts of interests within the CCC Group, or to the HR and Payroll Department.

SITUATIONS THAT TRIGGER A CONFLICT OF INTEREST

An employee places orders, or as a result of placing an order is responsible on behalf of the CCC Group for cooperation with relatives or other close persons, or with companies owned by the employee, the employee's relatives or other close persons.

An employee may, in line with their scope of responsibilities, make personnel decisions regarding, for example, compensation, promotion, or recruitment of relatives or other close persons.

An employee engages in or supports activities of other entities that may be harmful to the interests of the CCC Group.

It is not possible to list every potential conflict of interest situation, which is why it is so important to critically review any circumstances that may indicate a conflict of interest.

When in difficulty with assessing whether a conflict of interest exists, one should contact the Internal Auditor to either confirm or rule out the potential conflict.

9 PRODUCT SAFETY

We take responsibility for our product so its quality is of paramount importance to us. We are gradually expanding the line of environmentally-friendly products, thus taking care of our surroundings and mitigating negative impacts on the environment. In an effort to ensure safety of our products, we thoroughly check their quality at every stage of production. We strive to make our products compliant with national and international standards and regulations. We continually improve our manufacturing, warehousing and sale practices, and work on an ongoing basis to prevent situations that could affect product safety or quality.

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





REPORTING VIOLATIONS

| | | |
|-----------|---------------------------------------|-----------|
| 1. | WHO IS A WHISTLEBLOWER | 23 |
| 2. | WHAT IS NEEDED TO REPORT A VIOLATION | 23 |
| 3. | WHISTLEBLOWING MECHANISM | 24 |
| 4. | WHO WILL BE HANDLING YOUR APPLICATION | 24 |
| 5. | PROTECTIONS FOR WHISTLEBLOWERS | 25 |
| 6. | WHAT HAPPENS AFTER A REPORT IS MADE | 25 |

CCC

1. WHO IS A WHISTLEBLOWER

A whistleblower is a person who reports a violation of the values described in Section II. *RESPECT FOR VALUES*.

The following conditions must be met for a reporting person to be considered a whistleblower:

- **a whistleblower is a person** who is in possession of information that such person deems important and that provides evidence of a misconduct related to the operation of a company
- **the information must** be based on facts indicating that an instance of misconduct may have occurred and may have led to a violation of the law and the Code of Ethics
- **the whistleblower must want to** report the violation and must take appropriate and specific action to do so
- **the reporting person** must report a violation in good faith, acting in the belief that reporting it serves an important public purpose and is not merely an attempt to take revenge or cause harm

A violation may be reported using this procedure by any person who is in an employment relationship with a company of the CCC Group, irrespective of their position and function. This includes full-time employees as well as independent contractors, interns, and former employees.

2. WHAT IS NEEDED TO REPORT A VIOLATION

To streamline the process of reviewing the report, try to provide information on the following:

- the **general** nature of the violation
- the **date**, time and place where the violation occurred
- the **persons** involved in the violation and a description of their role
- **description** of the consequences of the violation
- information on **how** you have learned about the issue
- **information** on other witnesses

REMEMBER! Even if you do not have full evidence, report the issue using the Whistleblowing Mechanism. Do not undertake an investigation on your own. If your report has been filed in good faith, you will not suffer any disciplinary consequences.

CCC

3. WHISTLEBLOWING MECHANISM

Use one of the available channels to report a violation:



OLINE CONTACT FORM

corporate.ccc.eu/etyka

DEDICATED EMAIL ADDRESS

etyka@ccc.eu

TELEPHONE NUMBER

+48 76 845 8830

You can choose to report with your personal details or anonymously. All information reported is strictly confidential and is handled by persons bound by confidentiality obligation. You will be provided with a report code that you can use to find out about the status of your report. The information can be accessed by entering the report code in the panel at corporate.ccc.eu/etyka.



4. WHO WILL BE HANDLING YOUR APPLICATION

DEDICATED INDIVIDUALS

A report is first processed by the **Ethics Officer**, which guarantees protection of the whistleblower's details. The conduct of an investigation is the responsibility of the **Ethics Officer**, assisted by the **Compliance Officer**. In special cases, the Management Board is involved in the report handling procedure where the report concerns the Ethics Officer or the **Compliance Officer**. Any exchange of information for the purposes of the investigation is carried out with due regard to the rules of privacy protection, whistleblower protection, and whistleblower anonymity. All persons involved in the investigation are required to maintain the confidentiality of the information.

CCC

If a **Representative of the Ethics Officer** has been appointed in your organisation, your report will be handled by them. The Representative is responsible for reviewing reports of violation and conducting investigation within the entity in which they have been appointed.

CASES OF WORKPLACE BULLYING AND DISCRIMINATION

Any reports of bullying or discrimination are subject to a separate review procedure because of the flagrant nature of these violations. After a report is received, a Committee consisting of three persons is appointed. The persons appointed to the Committee may not have any interest or be involved in the reported case. The head of the organisational unit in which the person referred to in the report is employed may not be a member of the Committee. The Committee is headed by the Head of the Human Resources Department. The case is considered in Committee meetings. The proceedings before the Committee are confidential.

5. PROTECTIONS FOR WHISTLEBLOWERS

We provide protection to whistleblowers. The identity of the reporting person is protected and will not be disclosed without their consent, except where the CCC Group may be legally required to do so. Such a situation may occur, for example, if law enforcement authorities are involved in the investigation.

The CCC Group does not tolerate retaliation against whistleblowers. Any such actions will be considered a breach of the values provided for in this Code and may result in disciplinary consequences. Any retaliation should be reported using the Whistleblowing Mechanism.

A whistleblower is protected if the report was made in **good faith**, i.e. the whistleblower believes that the information they disclose is true and the report is not made to take revenge on the person(s) referred to in it or to obtain a personal gain.

A whistleblower is not protected if they are motivated by revenge or a personal gain.

6. WHAT HAPPENS AFTER A REPORT IS MADE

Once an incident has been reported, your report will be reviewed by the review team. The average time to process a report and initiate an investigation is seven business days. Investigation of reports found to be legitimate may take two months. In justified cases, this time may be extended. Unless the report has been made anonymously, the whistleblower will be informed of the results of the investigation in accordance with data protection rules.

If the report is found to be legitimate, the perpetrator will be subject to disciplinary measures that are commensurate with the offence and within the limits of the labour law. **For non-compliance with this Code of Ethics, the employer may deprive the employee of the right to certain privileges and benefits or take other applicable disciplinary measures resulting from internal regulations.**

In flagrant cases of bullying or discrimination, the employer may terminate the employment relationship with the perpetrator. The employer may also make a criminal complaint to law enforcement authorities. If you have comments on how a report was handled or on the results of the investigation you can get further information at **etyka@ccc.eu**.





CCC

Section **IV**

COMMUNICATING
THE CONTENTS OF
THIS CODE

CCC

COMMUNICATING THE CONTENTS OF THIS CODE

1. **Persons** to whom this Code applies are required to read it.
2. **Persons** to whom this Code applies are required to attend all training on the Code of Ethics. The CCC Group ensures that ethics training is incorporated into the onboarding training. At the end of the training, each participant is required to sign an acknowledgement that they have read the Code of Ethics. The acknowledgement form is provided in Appendix VI.3.
3. **Whenever amendments** are made to this Code of Ethics, the CCC Group undertakes to inform the employees of the amendments within no more than seven days.
4. **The CCC Group** undertakes to place information about this Code, and in particular about the Whistleblowing Mechanism, in the common areas at individual companies of the CCC Group.
5. **We also undertake** to ensure availability of a foreign language version of this Code in accordance with the needs of our employees.

PL

The Code of Ethics in the **Polish language** version is available at the following address:

CORPORATE.CCC.EU/ETYKA



EN:

The Code of Ethics in the **English language** version is available at:

CORPORATE.CCC.EU/EN/ETHICS







V

CCC

Section V

MONITORING AND UPDATING MECHANISM

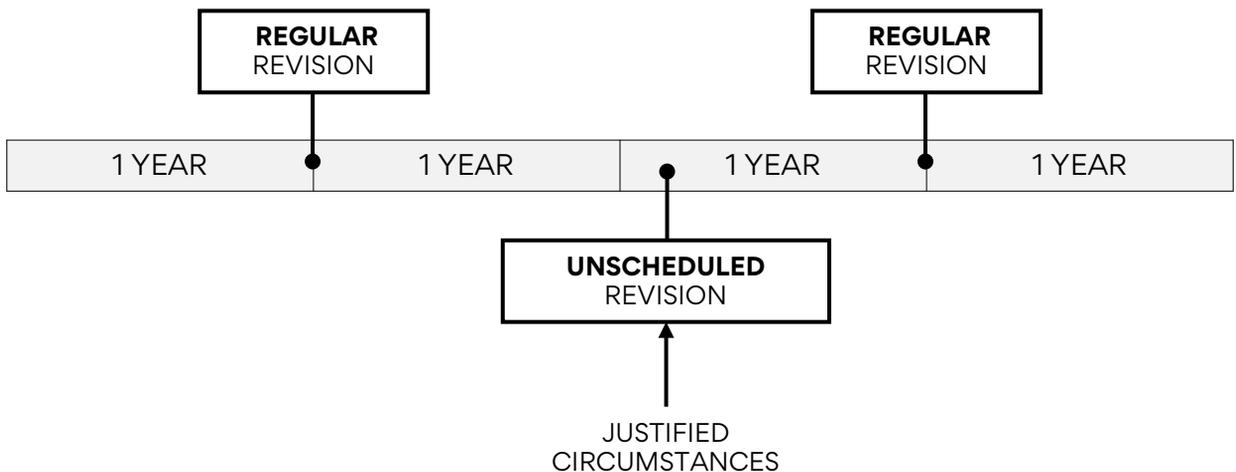
CCC

MONITORING AND UPDATING MECHANISM

REGULAR REVISIONS

Every **two years**, the Ethics Officer, assisted by the Compliance Officer, is required to review the contents of this Code of Ethics against the latest changes in international and national law.

The review should be accompanied by a survey conducted among persons to whom this Code applies, concerning awareness of its provisions and assessment of its effectiveness. The results of the analysis will be taken into account by the team working on the revision of this Code.



UNSCHEDULED REVISIONS

Revisions to this Code of Ethics may be made more frequently if the circumstances so require. Such circumstances could be, for example, functional ineffectiveness of this Code demonstrated with evidence, or legal changes that require immediate introduction of regulations to address the Group's approach to managing the Ethics area.



A woman with long dark hair is lying on a black lounge chair outdoors. She is wearing a sleeveless, ribbed, olive-green top and tan trousers. She is also wearing light-colored, wrap-style sunglasses. A light blue, quilted handbag with a silver chain strap is resting on her lap. The background shows a paved area and a shadow cast by the chair.

V I

APPENDICES

| | | |
|-----------|---|-----------|
| 1. | GLOSSARY | 37 |
| 2. | EMPLOYEE’S ACKNOWLEDGEMENT THAT THAY HAVE READ THE CCC GROUP CODE OF ETHICS | 38 |

1. GLOSSARY

| | |
|---|--|
| CCC GROUP | - the parent of the Group and all its subsidiaries |
| ILO | - International Labour Organisation, an organisation affiliated to the United Nations (UN) that deals with labour issues, in particular protection against forced labour, child labour, and protection of the freedom of association |
| OECD | - Organization for Economic Cooperation and Development, bringing together 37 highly developed countries, including Poland since 1996; its goal is to support the member states in achieving economic growth and improving the quality of civil life |
| UN GLOBAL COMPACT | - a United Nations pact to promote sustainable and socially responsible policies among businesses and firms |
| HUMAN TRAFFICKING | - the recruitment, transportation, transfer, harbouring or receipt of persons, by means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, for the purpose of exploitation |
| WHISTLEBLOWER | - a person who is in possession of information that such person deems important and that provides evidence of a misconduct related to the operation of a company |
| PROTECTED CHARACTERISTIC | - certain characteristic of a person's identity that is either acquired (e.g. religion, belief) or innate (e.g. skin colour, gender), and that may expose the person to discrimination; the Labour Code specifies the following characteristics: gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, religious denomination, sexual orientation, employment for definite or indefinite term, employment on a full-time or part-time basis |
| GOOD FAITH | - A person acting in good faith acts in the sincere belief that they do have the right that is the basis of their actions even where in fact no such right has been vested in them; since their belief, even if erroneous, is justifiable, the person is presumed to act in good faith. |
| BAD FAITH | - A person acting in bad faith invokes, as a basis for their actions, a right or legal relationship that they know, or should know, does not exist; unlike in the case of a person acting in good faith, the purported belief of a person acting in bad faith that such right or legal relationship exists cannot be justified. A person may be deemed to act in bad faith also where they actually do not know or cannot expect that the invoked right has not in fact been vested in them while they should know that. |
| PERSISTENT | - persistent behaviour is a behaviour or conduct that occurs repeatedly, is continued firmly and obstinately, and may even be viewed as persecutory; it indicates bad faith on the part of the person engaging in such conduct |
| ETHICS OFFICER | - a designated individual in the company who is responsible for monitoring compliance with the Code of Ethics, reviewing reported violations of ethical values, putting forward proposals to revise the Code of Ethics, and promoting ethical attitudes by, inter alia, organising and supervising training on ethics and human rights |
| ETHICS COMMITTEE | - a team appointed to investigate a report of violation of the principles of ethical conduct contained in the Code of Ethics |
| COMPLIANCE OFFICER | - a person responsible for mitigating the risk of the company's activities being non-compliant with legal regulations, standards or sets of recommendations, in order to prevent financial or reputational losses |
| REPRESENTATIVE OF THE ETHICS OFFICER | - a person who is responsible for local monitoring of compliance with the Code of Ethics, review of reported violations of ethical values, supervision of the conduct of training on ethics, coordination of the implementation of regulations on ethics at the individual company level, and submission of half-year reports on their activities to the Ethics Officer |

CCC

2. EMPLOYEE'S ACKNOWLEDGEMENT OF HAVING READ THE CCC GROUP CODE OF ETHICS

FIRST NAME.....

SURNAME.....

POSITION.....

DISCLAIMER

I acknowledge that have read the CCC Group Code of Ethics and I agree to comply with the rules prescribed in it.

I represent that I am aware of the disciplinary measures that I may be subject to on the basis of my employment relationship as a result of non-compliance with the Code of Ethics.

.....

DATE

.....

LEGIBLE SIGNATURE



ccc