**Business & Human Rights Resource Centre Survey Questions**

**CCC Group**

**For companies operating or investing in Ukraine**

**Nature of involvement**

1. How long has your company or subsidiary been operating or investing in Ukraine? In summary, can you briefly describe the nature, sector, scale, and geographic area of these operations or investments?

Our franchise partner has been operating in Ukraine since 2012. There are 18 CCC brick-and-mortar stores (out of the 1,000 in the entire Group) and an online store on the Ukrainian market.

**Assessing risks**

1. How is your company enhancing its due diligence to identify, prevent, and mitigate heightened human rights risks and comply with international humanitarian law?
   1. What measures is your company taking to ensure it relies and acts upon robust monitoring of the situation, including through consultation with your workers, the affected communities, human right groups, and/or humanitarian organizations?

The CCC Group Code of Ethics has been in place since 2014. It reflects the provisions of generally accepted legal norms such as: Universal Declaration of Human Rights, Charter of Fundamental Rights of the European Union, Ten Principles of the United Nations Global Compact, ILO (International Labour Organisation) Conventions, OECD Guidelines for Multinational Enterprises, and UN Guiding Principles on Business and Human Rights.

All employees of the CCC Group companies, regardless of the legal form of their employment relationship, are required to follow the Code of Ethics. The CCC Group also expects compliance with its provisions from individuals and entities cooperating with the Group, including our franchise partners.

**Mitigating risks and tracking effectiveness**

1. What measures is your company or subsidiary taking to ensure that your business relationships, products, services, operations, or other actions do not contribute to Russian military activities or occupation in Ukraine (including Crimea and occupied parts of Donetsk and Luhansk Oblasts)?

As early as on February 25th (one day after the attack on Ukraine was launched) we decided to discontinue all deliveries to the Russian market, although we still hoped for a quick cessation of hostilities in the region. Since this has not come to pass, we have decided to suspend our operations on the Russian market in their current form, as we earlier announced. This means, in particular, that we stop deliveries, close our online store, cease to grow CCC in Russia (the Group’s only business line present on that market), abandon our expansion plans and gradually scale down our operations. The investments we intended to make in the Russian market will likely be redirected to strengthen our position in CEE.

1. Is your company or subsidiary planning to scale-down or suspend your operations in Ukraine? If so, what are the immediate and longer-term steps that your company has taken or is prepared to take to mitigate the negative impacts of this decision on affected communities and your workers?

On the day of Russia’s attack on Ukraine, our franchise partner suspended operations and the employees were asked to stay home. However, in mid-March, in consultation with the employees, the partner decided to open 10 stores in Ukraine. They are located in regions located far away from those where military operations are taking place today. Employee safety is a priority, which is why only stores in the malls that have shelters are now in operation. The employees have also received appropriate training. The continuation of operations in Ukraine is beneficial for the country’s economy and provides the residents with uninterrupted access to goods. We monitor the situation and respond on an ongoing basis.

1. What steps is your company or subsidiary taking to ensure that your risk prevention and/or mitigation measures do not negatively impact Ukrainian civilians?

The CCC stores that currently operate in Ukraine are located in regions far away from those where military operations are taking place today. Employee safety is a priority, which is why only stores in the malls that have shelters are now in operation. The employees have also received appropriate training.

**Exercising leverage**

1. Is your company or subsidiary taking any other actions to promote respect for humanitarian law, human rights, democracy, and peace in Ukraine?

As the CCC Group, we actively support Ukrainian citizens and organise help.

As part of the GiveYourShoesaSecondLife campaign CCC stores receive shoes which after being disinfected are then donated to Ukrainian citizens in need. Thus far, over 52,000 pairs of shoes have been collected in Poland. The campaign has been expanded to other markets – the Czech Republic, Slovakia and Romania.

Through Caritas Poland we have donated over 10,000 new pairs of shoes to refugees, and several thousand more to smaller aid organisations operating along the eastern border. We are also constantly preparing new shipments of requested items. Those in need are receiving clothing, blankets, and other items of daily use. HalfPrice, a member company of the CCC Group, has already donated about 4,000 items to Caritas (blankets, pillows, toys, baby clothes). Also, at the request of MaxiFootball Foundation, the CCC Group has donated 400 thermal shoe insoles for young Ukrainian athletes.

The company has launched a support programme for employees from Ukraine. Each CCC Group employee is given one workday to engage in a charity project supporting Ukrainian citizens. The CCCHelps project enables CCC Group employees to help refugees find temporary housing.

We also provide long-term support to people from Ukraine, helping them find a job in Poland. We hope many people from across Poland’s eastern border will soon join our team. Job offers are posted on ccc.eu, in CCC stores and on OLX. The CCC Group is also working with HerImpact in this respect.

The value of the aid donated by the CCC Group has already reached PLN 2.5m.

**For companies operating or investing in Russia**

**Nature of involvement**

1. How long has your company or subsidiary been operating or investing in Russia? In summary, can you briefly describe the nature, sector, scale, and geographic area of these operations or investments?

CCC operated in Russia through a subsidiary (39 stores out of the 1,000 in the entire Group) from the fourth quarter of 2021. Before that, we had been present on that market under a franchise model.

As early as on February 25th (one day after the attack on Ukraine was launched) we decided to discontinue all deliveries to the Russian market, although we still hoped for a quick cessation of hostilities in the region. Since this has not come to pass, we have decided to suspend our operations on the Russian market in their current form, as we earlier announced. This means, in particular, that we stop deliveries, close our online store, cease to grow CCC in Russia (the Group’s only business line present on that market), abandon our expansion plans and gradually scale down our operations. The investments we intended to make in the Russian market will likely be redirected to strengthen our position in CEE.

**Assessing risks**

1. How is your company enhancing its due diligence to identify, prevent, and mitigate heightened human rights risks and comply with international humanitarian law?
   1. What measures is your company taking to ensure it relies and acts upon robust monitoring of the situation, including through consultation with your workers, affected communities, human rights groups, and/or humanitarian organizations?

The CCC Group Code of Ethics has been adopted across the CCC Group and reflects the provisions of generally accepted legal norms such as: Universal Declaration of Human Rights, Charter of Fundamental Rights of the European Union, Ten Principles of the United Nations Global Compact, ILO (International Labour Organisation) Conventions, OECD Guidelines for Multinational Enterprises, and UN Guiding Principles on Business and Human Rights.

**Mitigating risks and tracking effectiveness**

1. As the situation in Ukraine unfolds, is your company or subsidiary planning to cease operations in or divest from Russia? If so:
   1. What have been the key considerations informing this decision and did you consult with your workers and/or other affected stakeholders as part of your decision-making process?
   2. What are the immediate and longer-term steps that your company has taken or is prepared to take to mitigate any negative impacts of your exit on affected communities and your workers, including addressing any loss of income?

As the CCC Group we cannot condone this unprovoked and completely unjustified attack. Ukrainians are our neighbours, friends and colleagues. Since the invasion began, we have been actively supporting them by organising or joining numerous humanitarian aid efforts. This support is our absolute priority.

As early as on February 25th (one day after the attack on Ukraine was launched) we decided to discontinue all deliveries to the Russian market, although we still hoped for a quick cessation of hostilities in the region. Since this has not come to pass, we have decided to suspend our operations on the Russian market in their current form, as we earlier announced. This means, in particular, that we stop deliveries, close our online store, and cease to grow CCC in Russia (the Group’s only business line present on that market).

1. If your company or subsidiary chooses to continue operating in Russia, what human rights due diligence has been undertaken and how are you planning to mitigate harm in Ukraine?

Not applicable

1. What kind of due diligence measures does your company use to ensure that it does not have any business relationships with sanctioned Russian individuals and entities? Beyond sanctions compliance, how does your company ensure that it does not have any business relationships with individuals or entities with a track record of rights violating conduct?

As of February 24th 2022 the CCC Group did not have, and still does not have, any Russia-based business partners. Moreover, all products from Russian suppliers have been pulled off the shelves at the stores of our Group company HalfPrice.

**Exercising leverage**

1. How does your company intend to use your leverage to protect the rights of your workers and communities affected by your operations in Russia, including freedoms of association and expression?

As a major player in the European retail market, the CCC Group has openly expressed its position in all its communication channels, in which we stressed that we cannot condone this unprovoked and unjustified attack. We have suspended our operations in Russia, all products from Russian suppliers have been pulled off HalfPrice shelves. We are also supporting Ukrainian citizens through active aid efforts, the value of which has already reached PLN 2.5m.

1. Is your company providing any support to Russian activists who are taking action against the war and in support of democracy and peace in Ukraine?

 Not applicable