

Code of Conduct Policy

Policy brief & purpose

Our **Employee Code of Conduct company policy** outlines our expectations regarding employees' behavior towards their colleagues, supervisors and overall organization.

We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

Scope

This policy applies to all our employees regardless of employment agreement or rank.

Policy elements

What are the components of an Employee Code of Conduct Policy?

Company employees are bound by their contract to follow our Employee Code of Conduct while performing their duties. We outline the components of our Code of Conduct below:

Compliance with law

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

Respect in the workplace

All employees should respect their colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

Protection of Company Property

All employees should treat our company's property, whether material or intangible, with respect and care.

Employees:

- Shouldn't misuse **company equipment** or use it frivolously.
- Should respect all kinds of **incorporeal property**. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.

Employees should protect company facilities and other material property (e.g. company cars, machines, facilities) from damage and vandalism, whenever possible.

Professionalism

All employees must show integrity and professionalism in the workplace:

- **Personal appearance**

All employees must follow the dress code and personal appearance guidelines.

- **Corruption**

We discourage employees from accepting gifts from clients or partners. We prohibit bribes for the benefit of any external or internal party.

- **Job duties and authority**

All employees should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner.

We encourage mentoring throughout our company.

- **Absenteeism and tardiness**

Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours and days. But, generally, we expect employees to be punctual when coming to and leaving from work.

- **Conflict of interest**

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.

- **Collaboration**

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

- **Communication**

All employees must be open for communication with their colleagues, supervisors or team members.

- **Benefits**

We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.

- **Policies**

All employees should read and follow our company policies. If they have any questions, they should ask their managers or Human Resources (HR) department.

Committed to the ten principles of the Global Compact for Responsible Business.

Balknacar Zarya AD commits to promote and implement of the United Nations Global's Ten Principles relating to human rights, labor, environment and anti-corruption.

The Ten Principles of the United Nations Global Compact are derived from the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention against Corruption.

Human Rights

Principle 1 : we support and respect the protection of internationally proclaimed human rights in our area of influence.

Principle 2: we make sure that we are not complicit in human rights abuses.

Labor Standards

Principle 3: we uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: we support the elimination of all forms of forced and compulsory labor.

Principle 5: we support the effective abolition of child labor.

Principle 6: we support the elimination of discrimination in respect of employment and occupation

Environment

Principle 7: we keep a precautionary approach to environmental challenges

Principle 8 : we undertake initiatives to promote greater environmental responsibility

Principle 9 : we encourage the development and diffusion of environmentally friendly technologies

Anti - corruption

Principle 10: we work against all forms of corruption, including extortion and bribery, in our area of influence.

Disciplinary actions

Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behavior.

This Policy was adopted and approved by the Board of Directors on 07.12.2022

CEO of **Balkancar ZARYA AD.**

(Ventsislav Stoynev)

