

# Code of Ethics and Professional Conduct

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## 1. Purpose of this document

The Code of Ethics and Professional Conduct of Telelink Business Services Group (for short: TBSG or the Company) aims to establish moral norms and standards of conduct for employees in accordance with corporate principles such as legality, professionalism, confidentiality, teamwork, responsibility, and accountability, mutual respect, respect for personal dignity and exchange of knowledge.

Telelink Business Services Group realizes that corporate sustainability begins with the value system of the Company and an approach to conducting business, which is based on ethical principles and professionalism.

## 2. Scope and application

The Code of Ethics and Professional Conduct of Telelink Business Services Group applies equally and with equal weight to all employees of Telelink Business Services Group, including all the employees of each company in which Telelink Business Services Group controls more than fifty percent (50%) of the voting shares, regardless of the country in which the business is conducted.

Telelink Business Services Group also applies this Code to all subcontractors and service providers with which the Company cooperates in providing the agreed services to its customers, regardless of the territory in which the activities are performed.

## 3. General principles of ethics and professional conduct

Telelink Business Services Group is committed to maintaining compliance with the highest ethical and legal standards in the field of human rights, labor rights, environmental protection, and the fight against corruption.

Telelink Business Services Group operates in a socially responsible way towards people and the planet, committing itself to the universally recognized principles of the United Nations Global Compact (the Ten Principles of the United Nations Global Compact), which are an emanation of the Universal Declaration of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention against Corruption.

The company strives to carry out its daily activities in an honest and ethical manner, with respect to all employees, customers, suppliers, partners, subcontractors, competitors, public authorities, and society and in unconditional observance and respect for the rule of law, protection of indivisible and universal human values, human dignity, freedom, equality, and solidarity.

The employees of the Company participate and lead negotiations with third parties with a positive attitude, good tone, in accordance with the generally accepted principles and norms of correctness.

Telelink Business Services Group is proud of the integrity and professionalism of its employees, continuously promoting the sustainable application of ethical principles adopted by the Company and investing in improving the competence and professional qualification of employees.

### 3.1. Compliance with the applicable legislation

Telelink Business Services Group complies with all laws, regulations and international standards governing the company's activities.

The company ensures that it does not provide financial support or assistance to anyone involved in criminal activity, nor does it support a process by which individuals or corporations try to conceal profits from criminal activity or try to make them look legal (“money laundering”).

Actions controversial to legal provisions, good commercial practices or international standards adopted by the Company are inadmissible, regardless of the reasons justifying them.

Any action that could damage the reputation of the Company and could affect its good name should be avoided.

In case of suspicion of committing an illegal act, each employee should seek the advice and assistance of the Legal Department of the Company.

In view of the public status of TBSG, the employees of the Company treat kindly and with respect each shareholder, as well as any person who has shown interest in the company, explain in detail their rights within their official function and professional competence or refer them to a competent employee.

The employees of TBSG treat respectfully and responsibly the Financial Supervision Commission, the regulated securities market on which the shares of the Company are admitted for trading, the central depository, the financial analysts, the economic and other media, as well as all participants in the capital market in Bulgaria, providing the necessary assistance within their official functions and professional competence. The assistance under the previous sentence shall be provided in accordance with the requirements of the current European and national legal framework.

### 3.2. Relations with shareholders, investors, media, Financial Supervision Commission, and the regulated market for securities

The relations with the shareholders, the investors, the media, the Financial Supervision Commission, and the regulated market are carried out by the Director of Investor Relations, appointed under an employment contract with TBSG. A person who has the appropriate qualification or experience to perform his / her duties and cannot be a member of the management or supervisory body or a procurator of TBSG may be appointed as a person acting as Investor Relations Director.

The members of the Management Board of TBSG are obliged to assist the appointed Investor Relations Director in fulfilling his obligations.

The Investor Relations Director shall perform his duties with respect to shareholders, respecting the principles of equality, regardless of the number of shares held, nationality, race or ethnicity, age, gender, political or other beliefs.

Before providing financial and / or other information related to TBSG or the companies from its economic group to shareholders, potential investors, media, the Investor Relations Director receives explicit permission for this from a member of the Management Board of the Company. The permission for providing information according to the previous sentence is given orally - by telephone conversation with the Investor Relations Director or in writing - by special email to the e-mail address of the Investor Relations Director.

Investor Relations Director of TBSG provides information on the economic and financial indicators, as well as on the activity of the Company, except in the cases when they represent inside information, in the sense of Regulation 596/2014. The information referred to in the previous sentence shall be provided only after the procedure for its disclosure provided for in the Regulation has been complied with.

### 3.3. Fair and loyal competition

The company complies with national and European legislation in the field of competition protection and antitrust laws. Telelink Business Services Group competes only on the basis of the advantages of its solutions and services. The Company does not enter into any formal or informal agreements with its competitors regarding prices, levels of production or inventories, auctions or allocation to markets, customers, or suppliers.

### 3.4. Protection of confidential information

In the performance of their duties, employees receive access to confidential information about TBSG or partners, suppliers, or customers of the company. Every employee is obliged to treat with the necessary care to prevent misuse, theft, fraud, or illegal disclosure of this confidential information, to keep it secret, not to use it for personal gain or for purposes other than the purposes for which it is provided. The obligation not to disclose confidential information remains in force even after the employee leaves.

### 3.5. Prevention of conflicts of interest and corruption

A "conflict of interest" exists in a situation where an employee's ability to perform his or her duties effectively and impartially is potentially or effectively limited by the receipt of a benefit or its dependence on a third party. Telelink Business Services Groups' employees avoid any interaction with employees of suppliers, partners, or customers of the Company, when this may lead to a conflict of interest and prevent the exercise of independent judgment of the employee in the best interests of TBSG.

It is inadmissible to receive payments, gifts, entertainment, or other valuables (including the opportunity to provide work, in any form) to the employees of TBSG, when it is possible to represent or would seem to interfere with the employee's obligation of honesty, loyalty, protection of the interests of the company or other obligations to Telelink Business Services Group.

TBSG complies with all applicable anti-corruption laws and policies. The Company does not allow or tolerate any form of bribery, corruption, or other illegal practices in all their forms in its work with the state, officials, or local companies. In particular, the Company agrees to refrain from any actions and conduct that could be perceived as active or passive bribery, not to engage in bribes or any form of unethical incitement or payment, including payment to facilitate procedures and does not make political donations or spend funds for political and other similar purposes.

The company has developed and announced an Anti-Corruption Policy, which covers the principles and rules adopted by Telelink Business Services Group.

### 3.6. Ethical conduct of employees

In communication with each other, the employees of the Company are equal, the relations between them are based on trust, tolerance, ethics, and mutual assistance.

Behavior that violates the personal dignity and honor of employees, partners and third parties is not allowed.

Communication with colleagues and partners in the workplace is carried out in compliance with the architectural and functional distribution of workspaces and in compliance with the principle "not to disturb other colleagues".

Professional and personal disagreements are resolved by civilized methods in open communication and it is not allowed to be the subject of public announcement and discussion.

Any unworthy allusions to the personality or activity of another employee, partner, or contractor, as well as any form of unfriendly behavior, are inadmissible.

It is unethical and unacceptable to file unfounded complaints and make defamatory allegations against the employees of Telelink Business Services Group.

Any public statements must be agreed in advance and approved by the management of the Company.

Each employee is a representative of TBSG, and should demonstrate behavior that does not undermine the prestige of the Company, by:

- Respects the priorities of the Company and demonstrates a positive attitude, correctness, respect for the honor and dignity of the other.
- Does not make statements about TBSG and its employees, clients, partners, which statements would harm the Company or would violate the privacy of an employee, client, partner, or contractor of the Company.
- Protects the intellectual property of the Company and its partners.
- Takes care of his/her good appearance in accordance with established human norms and business etiquette.
- Decision-making is guided by the principles of objectivity and impartiality.
- Takes responsibility for his/her actions.
- Encourages communication and giving / receiving well-meaning and constructive feedback on the work process.
- Actively participates in the optimization and improvement of the work process and problem solving in the Company.
- Monitors opportunities for his/her development, maintains his/her skills and competencies.
- Does not disclose information that qualifies as internal, within the meaning of Regulation 596/2014, which became known to him during and on the occasion of the performance of his/her official duties.

#### 4. General principles of work arising from the ethical and professional values of the Company

TBSG guarantees and provides equal opportunities for all job candidates during recruitment and equal opportunities for development of all its employees.

The company does not tolerate any manifestation of discrimination and distinguishes itself from any bias based on national, religious, racial, ethnic, or other affiliation.

#### 4.1. Human rights

Telelink Business Services Group supports the protection and observance of internationally recognized human rights. Each employee strives to respect and honor the rights of each of his colleagues, clients, or partners in the performance of their activities.

Telelink Business Services Group ensures that it does not participate in any way, including indirectly, in activities that violate human rights.

#### 4.2. Labor standards

##### 4.2.1. Prohibition of child labor

As a socially responsible company, Telelink Business Services Group realizes that child labor can harm the physical, social, mental, psychological, and spiritual development of the child, depriving him of a normal opportunity to receive adequate education and qualifications. Therefore, the company applies a strict policy for non-employment of children under 16 years of age.

In certain cases, and in full compliance with all applicable regulatory requirements for child labor, the company hires only employees who meet the applicable minimum age requirements in the country. In these cases, the offered positions are fully consistent with the age, education and skills of the individuals and include the opportunity to effectively upgrade their knowledge and improve the qualifications to which they aspire.

In order to apply of the principle for prevention of illegal use of child labor, the Company also applies the following additional measures:

- Carrying out a strict check of the person's age and obtaining the explicit written consent of the parents when the law allows his employment under certain conditions.
- Preventing children under the legal age from performing any work activity.
- Introducing an obligation for the subcontractors with whom TBSG works to apply the above-mentioned measures for prevention of child labor.

##### 4.2.2. Prohibition of forced and compulsory labour

Telelink Business Services Group does not use or allow forced or compulsory labor.

The company complies with all applicable regulatory requirements for working hours and in all cases pays for the overtime worked by employees. In addition, the Company complies with all applicable provisions regarding salaries and allowances paid to employees.

All employment contracts concluded by the Company shall be provided in advance to the respective employee, indicating the terms and conditions of employment, the voluntary nature of employment, the freedom to leave and any consequences that may be related to departure or termination of employment.

##### 4.2.3. Freedom of association and collective bargaining

TBSG respects and observes the legal right of employees to communicate freely, as well as their legal right to associate, form or join a trade union or otherwise participate in collective bargaining.

Freedom of association implies respect for the right of all workers to form and join groups to promote and protect their professional interests freely and voluntarily.

The company does not interfere in the decision of the workers to associate, nor does it try to influence in any way their decision or discriminate against the workers who choose to associate or those who act as their representatives.

#### 4.2.4. Discrimination and harassment

Discrimination is a serious humiliation of personal dignity and human rights and leads to social tensions, which can be destructive to the business environment in the company and in the society. Any discriminatory practice in the field of employment leads to a limitation of the circle of workers and respectively - of the skills, competencies, and talents with which they can contribute to the development of the company.

Telelink Business Services Group prohibits and does not in any way allow direct or indirect discrimination against candidates in the selection of personnel and in terms of working conditions of employees based on race, nationality, ethnicity, human genome, citizenship, gender, origin, religion, education, age, disability, HIV / AIDS status, political affiliation, beliefs, personal and social status, trade union membership, sexual orientation, marital status, property status or any other special features established by law or in an international treaty under which the Republic Bulgaria is a country and complies with all applicable laws on discrimination in employment.

The prohibition of direct or indirect discrimination applies to all activities of TBSG and is applied consciously in the selection of personnel, incl. in connection with their participation in administrative, management or supervisory bodies of the Company, as well as with regard to the working conditions and determination of the remuneration of the employees.

TBSG provides equal remuneration for equal or equivalent work, equal criteria for performance evaluation and remuneration due. The company provides its employees with equal opportunities for vocational training and professional development and retraining, as well as for professional growth and promotion, applying the same criteria when evaluating their activities.

The company expressly prohibits any act of discriminatory behavior by the company's employees towards other persons, such as incitement to discrimination or harassment on this basis. Any allegations or complaints of discrimination or harassment shall be investigated and verified. Upon finding a violation, the company immediately takes measures to end the discriminatory behavior, as well as to exercise disciplinary responsibility if the harassment was committed by another employee. If necessary, the company addresses the problem to the competent institutions responsible for the implementation of anti-discrimination laws.

## 5. Environmental protection

Telelink Business Services Group understands and accepts environmental protection as a priority and supports the preventive approach to the environmental challenges. The company promotes environmental responsibility and the development and dissemination of environmentally friendly technologies.

The company complies with all applicable environmental laws and meets the requirements for environmental management of the international standard ISO 14001:2015. Telelink Business Services Group analyzes and evaluates the environmental aspects and the environmental impact of all activities and processes of the company.



## 6. Health and safety

Telelink Business Services Group always puts the safety and security of employees, partners, subcontractors, and the community first.

The Company complies with all regulatory requirements for ensuring healthy and safe working conditions, protection of life and health of employees in accordance with applicable local and European legislation, as well as the requirements of the international standard for management of health and safety at work BS ISO 45001:2018. The company does not allow work in violation of the above-mentioned requirements.

TBSG takes the necessary measures to ensure the physical safety and health of its employees, as well as to create a favorable and positive work environment that motivates them in the performance of their work duties and daily tasks.

## 7. Enforcement

Upon initial entry into office, the Talent Team shall acquaint the employee with the provisions of this Code, and the employee shall declare this with his signature.

TBSG encourages open and positive communication regarding the fair application of the rules and regulations described in this Code.

TBSG provides competent staff who are available for issues related to the application of the Code and the communication of suspicions of its violation.

Questions about enforcement and suspected violations can be addressed to [Ethics@tbs.tech](mailto:Ethics@tbs.tech).

In case of non-compliance with the norms of conduct set out in this Code, the employees of TBSG shall bear disciplinary responsibility in accordance with the Labor Code.

## Change control

### *Prepared / Amended current version*

<b>Revision</b>	<b>Date</b>	<b>Name, Surname, position</b>
01	18-11-2020	Desislava Torozova, Senior Legal Adviser Daniela Sokolova, Senior Business Process Architect Ivan Daskalov, Investor Relations Director

### *Change control*

<b>Revision</b>	<b>Date</b>	<b>Change description</b>
01	18-11-2020	New document

### *Current version*

<b>Approved by (Name, Surname, position)</b>	Ivan Zhitiyanov, Chief Executive director
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