



Anti-corruption Policy

Telelink Business

Services Group

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1. Purpose of this document

Telelink Business Services Group (for short: TBSG or the Company) is committed to ethical business practices and we expect our employees and the employees of our partners to conduct business with high ethical standards and in compliance with the law.

Telelink Business Services Group only does business with trustworthy and ethical partners.

In our daily dealings with others, our actions individually and collectively create and sustain our reputation. That means making business decisions and taking appropriate actions that are ethical and in compliance with applicable legal requirements. Failure to comply with anti-corruption law and regulations can have very serious consequences both for Telelink Business Services Group and for the individuals concerned.

Company's employees must therefore take great care to exercise good judgement at all times and should never put themselves or others into a position that may violate this Policy or applicable anti-corruption law provisions.

The main purpose of this Policy is to ensure that Telelink Business Services Group **does not tolerate** bribery and corruption and that approach is applied throughout the organization.

This Policy also aims to provide employees with guidance to how to handle various situations relating to bribery and corruption issues. This policy addresses the following types of illegal activities:

- bribery in the public, private and not-for-profit sectors;
- bribery by the Company, by the Company's personnel and/or the Company's associates acting on the Company's behalf and for its benefit;
- bribery of the Company, of the Company's personnel and/or of the Company's associates in relation to the Company's activities;
- direct and indirect bribery (a bribe offered and accepted through or by a third party).

The purpose of our Anti-Corruption Policy (the "Policy") is to help ensure compliance by Telelink Business Services Group, its subsidiaries and affiliated domestic or foreign companies with the applicable local, regional, and European anti-bribery legislation.

2. Scope of application

This Policy applies equally and with equal weight to all employees of Telelink Business Services Group, including for 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.

The Policy also applies to all third-party service providers. Partners shall conduct themselves with high ethical standards and comply with all applicable anti-corruption laws. No partner shall, directly or indirectly, promise, authorize, offer, or pay anything of value to any

government official to improperly influence any act or decision for the purpose of promoting the business interests of Telelink Business Services Group.

Providing improper gifts, payments, or items of value to Public Officials or other third parties (in private sector) could seriously harm the Company's reputation and could imperil its future. All of us and any third party acting on our behalf must refrain from any conduct which may be considered corrupt.

3. Terms and definitions

What is a bribery?

The legal definition of Bribery and Corruption may vary depending on which country you are in, however the fundamental principles apply universally: ***A bribery is offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial) directly or indirectly, and irrespective of locations, in violation of the applicable law, as an inducement or reward offered for a person acting or refraining from acting in relation of the performance of that person's duties.***

It is important to note that a Bribe is not just the giving of a cash payment. Bribery can take many forms: a gift, an advantage, support for a campaign or organisation, or potentially anything which can be deemed of value to a person or organisation.

The more common types are listed below:

- lavish/ excessive gifts, entertainment or hospitality given the circumstances (e.g., iPhones/ laptops/ designer bags or other high value ticket items);
- unwarranted rebates or excessive commissions over and above those which you would normally expect to pay in such a transaction (e.g., to sales agents or marketing agents);
- unwarranted allowances or expenses (e.g., sending the 'customer' on unnecessary 5* trips, or giving them excessive cash allowances);
- Political/Charitable contributions on behalf of third-party organizations.

In the context of our Anti-Corruption Policy, this means that neither Telelink Business Services Group, nor our Service Providers may promise, offer, pay or authorize the payment of money or anything of value, directly or indirectly, to domestic or foreign Public Officials, Public Officials' Family Members or any Third Party in an attempt to influence them to obtain or retain business or secure any improper advantage for the Company.

For purposes of this Policy, " Public Official" means:

- Any person holding a legislative, administrative or judicial office whether by appointment, election or succession, or any person exercising a public function, including for a public agency or public enterprise, or any official or agent of a public domestic or international organization, or any candidate for public office.

"Family Member" means a parent, spouse, child, sibling, uncle or aunt.

“**Third Party**” means any person or body that is independent of the Company.

4. Prohibited activities

Specifically, neither we nor those we do business with may engage in the following prohibited activities:

Bribery: Offering, promising, giving, accepting, soliciting, or authorizing any undue advantage of any value (financial or non-financial) to any Public Official or its Family Member or any third party directly or indirectly in violation of the applicable law as an inducement or reward to act or refrain from acting any of its duties, obtain or retain business or secure any improper advantage on the Company’s behalf. It does not matter whether the gift or payment is called a “Bribery.”

There is no minimum amount or threshold of value to be exceeded before such a gift or payment becomes illegal if there is an intent to influence the Public Official or any other third party to obtain or retain business or secure any improper advantage for the Company. “Commissions”, “tips”, “gratuities” and “gifts” are all prohibited if they are offered or made directly or indirectly in an attempt to corruptly influence them to make decisions which benefit the Company or any of its business associates.

Political Contributions: Making contributions to political parties or public officials to obtain their support for executive, legislative, administrative, or other action that may be favorable to the Company.

Third-Party Payments: Giving, promising, or offering to give, or authorizing the giving of money or anything of value to a third party when there is knowledge or awareness, or the circumstances suggest a high probability, that the same will be provided to obtain or retain business or secure an improper advantage on the Company’s behalf.

If the gift/ hospitality does not fall easily into one of the above categories and you are still unsure whether it may be construed as a Bribery, then you should consider the overall nature of the transaction/ dealings and your relationship to the third party and ask yourself:

- Is the benefit I am giving or receiving reasonable and justified in the circumstances?
- If I had to disclose these to my line manager or if they were leaked to the media, then these would not embarrass either Telelink Business Services Group or me?
- If the answer to both these questions is clearly “NO” then this may indicate that these would be acceptable.

5. Gifts and hospitality

Gifts and hospitality are commonly offered as gestures of gratitude or tokens of appreciation. TBSG allows these tokens and gestures when they are appropriate and in compliance with the Code of Ethics and Professional Conduct, this policy, the established anti-bribery processes and local and international laws on anti-bribery and anticorruption.

The Company only offers or accepts gifts and hospitality that are:

- made in good faith, occasional, and reasonable,
- a normal business courtesy, and
- transparent.

Any gifts, items of value offer, hospitality or entertainment offered to a representative of the company, that are not made in a good faith, nor are reasonable or appropriate, or are for corrupt or improper purposes, must be reported immediately through one of the established communication channels.

5.1. Gifts

All gifts provided to business associates on behalf of the Company are going through idea and design approval, as well as budget approval by the Chief Executive Officer. All approved budgets are controlled by the Accounting and Finance Director.

5.2. Hospitality & entertainment

Acts of hospitality must be proportionate and reasonable and can be accepted or provided with regard to travel, meals and entertainment that are legitimately designed to show appreciation to existing business partners, and/or to present products and services to, or establish cordial business relations with existing or prospective business partners.

Expenses for hospitality and entertainment are allowed to the teams and employees whose position, duties and responsibilities require public appearance and representation, and tight contacts with business associates of the company. Such expenses are budgeted annually, approved by the Chief Executive Officer and monitored by the Accounting and Finance Director.

5.3. Guidance

Telelink Business Services Group is committed to upholding the highest standards of integrity and ethical conduct in all aspects of its business. The importance of maintaining transparency and avoiding conflicts of interest, particularly in matters related to gifts and hospitality, is recognized on all levels in the organization. As such, TBSG relies on the ethics, common sense, and conscientious judgment of its employees to adhere to good practices when giving or receiving gifts and hospitality. To provide guidance, the company has established thresholds for the amounts of gifts and hospitality that employees may accept or offer. These thresholds serve as a reference point to help ensure compliance with our policies and relevant regulations. By exercising sound judgment and discretion, TBSG reinforces its commitment to fostering trust, integrity, and accountability in all its interactions.

The following thresholds have been set as guidance. Amounts that exceed the below thresholds, are subject of approval of every Country Director of TBSG, according to the location where the gift/hospitality is exercised:

Type	Threshold	Threshold exceedance approval by
Gift	100 EUR per person*	Country Director
Hospitality: dinner or lunch	50 EUR per person*	Country Director
Hospitality: trip or accommodation	500 EUR per person*	Country Director

*Please note that the count per person refers to the receiver(s) of the gift or hospitality offered.

6. Compliance with laws and regulations

Telelink Business Services Group complies with all laws, regulations and international standards governing the company's activities. The company takes into consideration all applicable laws and regulations into force within the country of operation of Telelink Business Services Group and of each company where TBSG controls more than fifty percent (50%) of the voting shares. Furthermore, the company takes into account all applicable legislation on anti-corruption established within the European Union, as well as other country-specific anti-corruption laws in locations where TBSG may provide services, such as U.S. Foreign Corrupt Practices Act, UK Bribery Act, etc.

Telelink Business Services Group conducts its business according to the local and international laws and regulations, including such imposed by the European Union, United States, etc., that surround trading activities and the import and export of products, services, and technology. The company will not tolerate to be involved in business activities with any sanctioned or restricted persons or countries and will not cooperate with any restrictive trade practices that are prohibited under applicable laws.¹

The company ensures that it does not provide financial support or assistance to anyone convicted with any type of fraudulent activities, 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.

7. Requirements and responsibilities

The Company has appointed the members of the **Governance, Risk and Compliance** team to act as an **anti-bribery compliance function**, and as such to oversee the Policy and the Company’s compliance program designed to ensure compliance with the Policy and related

¹ All applicable legislation and restrictions are included in the document “Organisational Context” together with the forbidden for trade list of countries. For more information, contact the Governance, Risk and Compliance Team.

processes and procedures. All matters concerning this Policy will be consulted with a **Senior Legal Adviser** when applicable.

The **anti-bribery compliance function** reports to the Executive Director and has direct access to the Supervisory Board.

All contracts with Service Providers must follow the due diligence and approval procedures found in the Telelink Business Services Group for engaging suppliers and Third-Party Service Providers. Our agreements with Service Providers contain specific anti-corruption provisions to ensure compliance with our anti-corruption policies.

If you are approached by any person, governmental or non-governmental, seeking a corrupt payment or attempting to arrange a corrupt payment, or if you learn of any potential violation of this Policy, you must immediately report the matter through the [Speeki Platform](#) or by sending an email to Ethics@tbs.tech.

If you have any concerns about your anonymity, you can report the matter in written to the address of the Company to the attention of the Ethics Commission.

All Telelink Business Services Group employees must declare of all applicable hospitality and gifts offered and received in accordance with the boundaries as prescribed. This states the level at which gifts and hospitality should be reported and the approval requirements for both giving and acceptance.

Questions about this Policy or about a specific transaction should be addressed to the **Governance, Risk and Compliance Team**.

8. Reporting and penalties

The Company expects the strictest compliance with these procedures. All Telelink Business Services Group employees must declare of all applicable hospitality and gifts offered and received in accordance with the boundaries as prescribed.

This states the level at which gifts and hospitality should be reported and the approval requirements for both giving and acceptance.

If you become aware of any potential or actual violation of this policy or the anti-bribery laws, you must immediately alert the **Governance, Risk and Compliance Team** - the team acting as compliance function. Concerns, suspicions, and reports can be submitted through one of the following channels:

- [Speeki Platform](#)
- Ethics@tbs.tech
- In written to the address of the Company to the attention of the Ethics Commission

Questions about enforcement and suspected violations can be addressed to Ethics@tbs.tech.

Reporting of concerns and suspicions for violation must be made in a good faith or on the basis of reasonable belief attempted, suspected and actual bribery, or any violation of or weakness in the anti-bribery processes.

Furthermore, the employees of TBS will not suffer retaliation, discrimination or disciplinary action (e.g. by threats, isolation, demotion, preventing advancement, transfer, dismissal, bullying, victimization, or other forms of harassment) for the following actions:

- Refusing to participate in, or turning down, any activity in respect of which they have reasonably judged there to be more than low risk of bribery that has not been mitigated by the Company.
- Concerns raised or reports made in good faith, or on the basis of reasonable belief, of attempted, actual or suspected bribery or violation of the Anti-corruption Policy or anti-bribery processes (except where the individual participated in the violation).

Any violation of these anti-corruption provisions is punishable by criminal penalties - (imprisonment and monetary fines). Any violation of this Policy by any employee, director, officer, or third party represents a disciplinary violation which may lead to and result in disciplinary sanction, up to and possibly including termination of employment or of the engagement contract.

9. Inadequacy of anti-bribery controls

Where the due diligence conducted on a specific transaction, project, activity, service provider or third-party establishes that the bribery risks cannot be managed by existing anti-bribery controls, and the company cannot or does not wish to implement additional or enhanced anti-bribery controls or take other steps to enable the Company to manage the relevant bribery risks, TBSG will:

- Take appropriate steps to the bribery risks and the nature of the transaction, project, activity, or business relationship to terminate, discontinue, suspend, or withdraw from it as soon as practicable when its existing transaction, project, activity, or business relationship.
- Postpone or decline to continue when its proposed new transaction, project, activity, or business relationship.

Change Control

Prepared / Updated current version

Revision	Date	Name, Surname, position
07	14-07-2023	Divna Doycheva, Senior Risk and Compliance Expert

Change control

Revision	Date	Change description
01	15-11-2018	New document
02	17-05-2021	Updated as per the requirements of ISO 37001:2016
03	17-08-2021	Update and detailed description of terms and definition related to anti-bribery
04	17-07-2022	Update of the communication channels for submitting concerns, suspicions, and reports
05	05-12-2022	Clarification on compliance with applicable legislation and regulations
06	14-07-2023	Reviewing Gifts and hospitality section
07	07-05-2024	Thresholds and guidance in Gifts and hospitality section

Current version

Approved by (Name, Surname, position)	Ivan Zhitiyanov, Chief Executive Director
Date of approval	10.05.2024
Approval method	Meeting