

CODE OF CONDUCT

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Chapter 1. General Provisions

1. Objective

This Code of Conduct [the “Code”] is a guideline for appropriate conduct and standards that all the officers and employees (“Employees”) shall comply with in the workplace.

2. Coverage

The Code shall apply to all Employees working within. All Employees working abroad shall also comply with all local laws and regulations in addition to the Code.

If company regulations conflict with the Code, company regulations shall be revised to meet the standards of the Code.

3. The Operations of the Code

Details of the Code will be separately provided as the Guidelines for Ethical Management.

If the Code or the Business Ethics Guidelines are unclear, or if there are conflicting interpretations, Internal Auditing Team shall be consulted. Internal Auditing Team’s interpretation and decision on unclear and/or conflicting interpretations shall be final to be followed by all Employees.

All Employees shall confirm that they understand the Code and submit a written pledge to comply with the Code.

Chapter 2. Commitment to Our Customers

1. Customer Satisfaction

We recognize that customer satisfaction is best achieved with supplying the highest quality products on time and we shall make our best efforts to achieve this goal.

We recognize that customers are the foundation of our company [the “Company”]’s inspiration and development. Customer satisfaction shall be our top priority and basis of our decisions and actions.

We shall preserve our customers’ interests and safety.

2. Improvement of Customer Value

We commit ourselves to providing customers with material value and services based on the idea that our customers’ success leads to the Company’s success.

We shall offer the best quality products and services at a reasonable price and actively take our customers’ suggestions into account.

Chapter 3. Respect for Shareholders

1. Maximizing Shareholders’ Value

We shall seek to maximize the shareholders’ value in the Company through effective management and generating profits.

We shall be transparent in releasing management and corporate information to the public, meeting due requests from our shareholders and investors, and building relationships based on mutual trust.

2. Observance of Financial Accounting Standards for Business Enterprise

We shall record and manage all accounting documents under the International Financial Reporting Standards (IFRS), and provide our financial information to the public transparently.

We shall provide the investors with all business information in accordance with relevant regulations for the investors to make fair investment decisions.

Chapter 4. Mutual Prosperity with Business Partner

1. Equal Opportunity

We shall provide all eligible partner companies with equal opportunities for fair business transactions.

We shall select our partner companies through fair competition and selection criteria.

2. Fair Business Practices

We shall not abuse the Company's market position to compel unreasonable conducts or exercise undue influence.

3. Pursuance of Mutual Development

We shall work to make a fair and transparent business practice with our partner companies based on mutual trust and co-operation.

We shall encourage and support our partner companies' business ethics.

Chapter 5. Social and National Responsibility

1. Observance of Domestic and International Laws

As a member of the national and international community, we shall comply with domestic and international laws and all common universal rules, regulations and norms.

We shall comply with the Domestic and Foreign Anti-Corruption Laws, International anti-corruption conventions and Guidelines for Compliance with Anti-Corruption Laws in performing business affairs inside and outside of Bulgaria.

We shall maintain a sound market system through fair competition based on high quality and technology products.

We shall reject thoroughly any and all the irregularities interfering with a sound market system.

2. Contribution to social and national development

We shall contribute to the development of our national economy and the community through improving productivity, creating jobs, paying correct tax, etc.

We shall fulfill our societal role and responsibility faithfully and assist the development of the local community.

We shall work to preserve nature and maintain clean environment and comply with all relevant laws and regulations.

Chapter 6. Responsibility towards Employees

1. Respect for Employees

We shall recognize all Employees' inherent value and respect their individual rights and dignity.

We shall create a work environment where all Employees feel dignity and pride in their work performance.

2. Equal Treatment

We shall provide all Employees with an equal opportunity to develop their talents and allocate tasks impartially based on their capability.

We shall not discriminate all Employees based on gender, nationality, religion, academic background, hometown, age and/or any other factors that are not related to their duty.

3. Human Resources Development

We shall respect our Employees' autonomy and creativity and support their self- development.

We shall establish a system necessary to carry out all Employees' duty and personal development and also provide an environment where it can be executed.

4. Safe Working Environment

We shall make our best endeavor to prevent accidents at work and shall ensure all Employees work in a clean and safe working environment.

We shall hold regular health and safety inspection of our facilities and provide routine safety training to all Employees in order to secure safety of all Employees at work.

Chapter 7. Employees' Basic Ethics

1. Basic ethics

All Employees shall conduct themselves in a professional and ethical manner with pride and dignity at all times.

All Employees shall commit themselves to self-development through continuous effort and innovation.

All Employees shall work to build faithful relationships among peers and employees of all levels through effective communication as well as to achieve a cooperative labor-management relationship.

2. Fulfillment of Duties

All Employees shall carry out their duties based on all applicable rules and regulations as well as the Company's business policy and the Elprom Heavy Industries Spirit.

All Employees shall recognize their given authorities and responsibilities and make all decisions and actions in accordance with the Company's goals and the Code.

All Employees shall actively cooperate with peers and related departments to maximize job performance.

3. Fair Performance of Duties

All Employees shall carry out their duties justly to the best of their abilities. If they are given undefined duties, they shall adopt rational and reasonable judgment in carrying out those duties.

All Employees shall not take any kinds of pecuniary interests with any parties if those interests would hinder the fairness of carrying out their duties.

All employees shall not offer, promise, authorize or provide Economic Benefits to existing or future transaction counterparties, including Domestic or Foreign Government Employees, directly or through a third party, for the Purpose of Obtaining Illicit or Improper Gains.

All Employees are prohibited from any immoral, unethical or illegal action that damages the Company in employees' everyday life or in job-related situations.

4. Gifts and Pecuniary Transactions among Employees

All business gifts are prohibited except for those that are permitted by law and are socially accepted.

Any pecuniary transactions such as lending or borrowing of money and providing or being provided with a payment guarantee for a loan among Employees are prohibited in principle. If an unavoidable situation arises, those transactions may be accepted to a limited extent and methods.

5. Prevention of Sexual Harassment at the Workplace

All Employees shall recognize illegality of sexual harassment at work and its consequence of depriving motivation and productivity. All Employees shall not commit any acts which are sexually harassed in nature.

To prevent sexual harassment within the workplace, we shall provide appropriate educational training to all Employees.

6. Protecting Company's Assets

All Employees shall protect the Company's assets at all times and must not use the Company's property for personal interest.

All Employees shall protect the Company's confidential information and document at all times. The Company's confidential information shall only be provided to the authorized personnel and under no circumstance, be disclosed to unauthorized parties.

All illegal software shall be prohibited.

7. Insider Trading and Abuse of Information

All Employees shall be prohibited from disclosing the Company information obtained through their jobs. All Employees shall also be prohibited from using the Company information to benefit themselves and their families or a third party.

All Employees with important undisclosed information about the Company shall be prohibited from trading the Company's stocks or all related client/company's stocks until such information is released to the public.

8. Work Environment and Health and Safety Management

All Employees shall try their best to maintain a safe and comfortable working environment and shall be responsible for preventing accidents at work.

All Employees must comply with health and safety laws and regulations, and safety code.

Chapter 8. Information management

1. Business information

Business information (including, but not limited to, employee information and technical data) must be managed carefully.

2. Information management

EHI comply with all applicable data protection laws and implement effective measures to secure data, processing, handling and other controls in a consistent manner.

This information management is essential to prevent unauthorized access to or breach of the company data.

3. Cybersecurity

To secure its IT systems, the EHI sets up a Cybersecurity process in accordance with the Cybersecurity legislation (NIS2 Directive), in particular:

- Analyse risks and evaluate vulnerabilities for systems, data, and processes that need to be protected and assess potential threats.
- Set a security policy and develop rules to ensure the protection of data, systems and infrastructure.
- Implement technical and organizational measures (firewall, antivirus, encryption, backup, access control, network segmentation) and train employees.

Monitoring and detecting incidents will help to detect them more quickly and limit potential losses caused by attacks.

Chapter 9. Additional Provisions

1. Effective Date

This Code of Conduct for Business Partners is enacted and effective from 01.01.2019.

The last amendment to this Code of Conduct for Business Partners has been in effect of 02.03.2026.