

SUSTAINABILITY POLICY

of VIDEOTON Bulgarian Holdings EOOD, part of VIDEOTON Bulgaria

We recognise our responsibility for the impact of our activities on the environment, society and the economy. Sustainability is an integral part of the way we manage our operations and of our commitment to our customers, employees, suppliers and the communities in which we operate.

This policy sets out our principles and commitments across the interconnected areas of sustainable development.

I. Environment

We are committed to reducing the impact of our activities on the environment and to contributing to the transition towards a low-carbon economy.

Climate and emissions

- ✓ we track, measure and report our greenhouse gas emissions;
- ✓ we work towards their continuous reduction and set specific targets;
- ✓ we prefer logistics solutions with a lower carbon footprint.

Energy

- ✓ we aim to use electricity from renewable sources;
- ✓ we continuously improve our energy efficiency.

Resources and waste

- ✓ we apply the principles of the circular economy by reducing, reusing and recycling materials and resources;
- ✓ we manage waste and natural resources responsibly;
- ✓ we raise the environmental awareness of our employees through regular training.

II. Social responsibility

People are at the core of our success. We respect the rights and dignity of every employee and care for their wellbeing.

Human rights

- ✓ we respect internationally recognised human rights;
- ✓ we do not use or support child, forced or compulsory labour in any form;
- ✓ we do not require the deposit or retention of personal documents and do not charge fees to job candidates at any stage of the recruitment process.

Working conditions

- ✓ working hours comply with the applicable labour legislation and do not exceed 48 hours per week, with at least one rest day in every seven-day period;
- ✓ overtime is permitted only in cases of exceptional necessity, is always voluntary and is remunerated in accordance with the **Bulgarian Labour Code**;
- ✓ we grant leave in accordance with the provisions of the **Bulgarian Labour Code**;
- ✓ we ensure remuneration in accordance with the applicable legislation, striving for it to reflect the local living wage that ensures a decent standard of living;
- ✓ we do not impose financial penalties as a disciplinary measure.

Equal opportunities and protection from discrimination

- ✓ we ensure equal opportunities by prohibiting discrimination in any form and by strictly prohibiting any harassment;
- ✓ we respect the right of employees to organise and/or join trade unions of their own choosing, as well as the right to collective bargaining.

Health and safety

- ✓ we provide healthy and safe working conditions;
- ✓ we identify, assess and manage health and safety risks;
- ✓ we conduct regular training and briefings for employees;
- ✓ we provide appropriate personal protective equipment;
- ✓ we strive to prevent occupational accidents and diseases.

Training and development

- ✓ we invest in the knowledge and skills of our employees and provide them with opportunities for professional development;
- ✓ we support the local communities in which we operate and encourage our employees to take part in socially meaningful initiatives.

III. Governance

We manage our operations with integrity, transparently and in compliance with the applicable requirements.

Ethics and integrity

- ✓ we uphold the highest standards of business ethics and apply zero tolerance to bribery, corruption and abuse, in accordance with the **Code of Conduct and Ethics** of [VIDEOTON Bulgaria](#);
- ✓ we comply with the rules of fair competition and the applicable antitrust legislation;
- ✓ we provide our employees with channels for reporting irregularities without fear of retaliation, in accordance with the **Whistleblowing Policy** of [VIDEOTON Bulgaria](#).

Responsible supply chain

- ✓ where applicable, we consider ethical, environmental and social criteria in the selection, assessment and management of our supplier relationships;
- ✓ we expect our suppliers and business partners to demonstrate responsible business conduct and comply with our **Code of Conduct and Ethics**, as well as recognized standards such as the **Responsible Business Alliance Code of Conduct** or equivalent standards, where applicable.

Compliance and transparency

- ✓ we identify, monitor and comply with the applicable statutory, regulatory and customer requirements;
- ✓ we identify and manage the risks associated with our activities;
- ✓ we protect personal data and confidential information in accordance with **Regulation (EU) 2016/679 (GDPR)** and the applicable legislation;
- ✓ we disclose our sustainability results through recognised assessment and reporting platforms such as **CDP** and **EcoVadis**, as well as through other appropriate channels.

IV. Conflict minerals

We comply with **Regulation (EU) 2017/821** on supply chain due diligence for conflict minerals (tin, tantalum, tungsten, gold and their ores) from conflict-affected and high-risk areas, as well as **Recommendation (EU) 2018/1149**.

To keep our products free of such minerals, we apply the following measures:

- ✓ we identify the products that may potentially be affected by the use of conflict minerals;
- ✓ we do not purchase products or materials containing conflict minerals originating from conflict-affected and high-risk areas;
- ✓ we expect our suppliers to ensure that the minerals used originate from outside such areas, to maintain their own conflict minerals policies and to apply due diligence for tracing the origin;
- ✓ we encourage our suppliers not to discriminate against legitimate and responsible sources of conflict minerals;
- ✓ where applicable, we collect mineral origin declarations from our suppliers using recognized reporting templates, including the **CMRT** for **3TG** (tin, tantalum, tungsten, gold) and **EMRT** for the extended minerals (cobalt, mica, copper, graphite, lithium, nickel);
- ✓ we support our customers in fulfilling their obligations to disclose the origin of the materials used.

V. Product compliance

We manage the chemical compliance of our products in accordance with the applicable regulatory and customer requirements, by:

- ✓ monitoring the regulations restricting hazardous substances in products, including **REACH (SVHC)**, **RoHS**, **POPs** and **PFAS**;
- ✓ requesting compliance declarations from our suppliers for the raw materials, materials and components we use;
- ✓ declaring the compliance of our products on the basis of the information received;
- ✓ providing analytical testing only where this is expressly agreed or is a regulatory requirement;
- ✓ using specialised platforms for reporting compliance data to our customers.

I DECLARE
MY PERSONAL COMMITMENT AND RESPONSIBILITY FOR THE
IMPLEMENTATION AND CONTINUAL IMPROVEMENT OF THIS POLICY

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Stara Zagora

Valentin Dichev
Managing Director

