

SUSTAINABILITY POLICY

of VIDEOTON Bulgarian Holdings EOOD, part of VIDEOTON Bulgaria

mandatory for all workers, employees and interns at the site
in Stara Zagora, 10 Nikola Petkov Blvd.

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. We operate a certified environmental management system in accordance with **ISO 14001**.

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 are increasing the share of 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 monitor our water consumption and work to reduce it;
- ✓ we manage waste, including hazardous 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. We also support the communities in which we work and live.

Human rights

- ✓ we respect internationally recognised human rights;
- ✓ we do not use or support child, forced or compulsory labour in any form; all work with us is voluntary;
- ✓ we do not require the deposit or retention of personal documents;
- ✓ we do not charge fees to candidates or employees at any stage of the recruitment process, regardless of the type of employment or their origin; where any such fee is identified, it is reimbursed.

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, does not exceed the statutory limits (6 hours of day work per week and 150 hours per year) and is remunerated in accordance with the **Bulgarian Labour Code**;
- ✓ persons under 18 do not perform night work or overtime and do not carry out work that may endanger their health or safety;
- ✓ 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 provide equal pay for equal work and qualifications;
- ✓ we do not impose financial penalties or deductions from remuneration as a disciplinary measure.

Equal opportunities, protection from discrimination and humane treatment

- ✓ we ensure equal opportunities and prohibit discrimination in any form, on the grounds set out in the **Code of Conduct and Ethics** of [VIDEOTON Bulgaria](#);
- ✓ we do not tolerate harassment or inhumane treatment in any form, including sexual harassment, corporal punishment, physical or mental coercion, humiliation or verbal abuse, or the threat of such treatment;
- ✓ 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 provide ready access to clean sanitary facilities and drinking water;
- ✓ we strive to prevent occupational accidents and diseases.

Training, development and communities

- ✓ we invest in the knowledge and skills of our employees and provide them with opportunities for professional development;
- ✓ we provide managers and employees with training on the implementation of our policies and procedures and on compliance with the applicable requirements;
- ✓ we 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 accessible channels for reporting irregularities, without fear of retaliation, in accordance with the **Internal Whistleblowing Policy** of [VIDEOTON Bulgaria](#);
- ✓ we do not tolerate the falsification of documents or the misrepresentation of conditions and practices in the supply chain.

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;
- ✓ we communicate our requirements to our suppliers and monitor their compliance;
- ✓ we expect our suppliers to apply the same requirements throughout their own supply chain.

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 carry out periodic self-assessments and take corrective action where gaps are identified;
- ✓ management periodically reviews the implementation of the established policies;
- ✓ we protect personal data and confidential information in accordance with **Regulation (EU) 2016/679 (GDPR)** and the applicable legislation;
- ✓ we publicly disclose our policies and communicate them to our employees;
- ✓ we disclose our sustainability results on our corporate website and through recognised assessment and reporting platforms such as **CDP** and **EcoVadis**, as well as through other appropriate channels.

IV. Conflict minerals

We align with the requirements and support the objectives of **Regulation (EU) 2017/821**, as well as **Recommendation (EU) 2018/1149**. We apply due diligence in accordance with the **OECD Due Diligence Guidance** for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. To ensure the responsible origin of these minerals, we apply the following measures:

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 allow minerals whose origin supports armed conflict or human rights violations into our products;
- ✓ we expect our suppliers to trace the origin of the minerals used, to maintain their own conflict minerals policies and to apply supply chain due diligence;
- ✓ 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, natural 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

August 2026
Stara Zagora



Valentin Dichev
Managing Director