VIDEOTON
Bulgaria

VT DZU
VIDEOTON Bulgarian Holdings
VEAS Bulgaria
VT Bulplast

CODE OF CONDUCT AND ETHICS

TECHNOLOGY
STABILITY
SUSTAINABILITY
DYNAMISM

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VIDEOTON
Bulgaria

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Contents

1. Introduction....3
2. Scope.... 4
3. Ethical values 4
3.1 Child labour, forced labour, modern slavery and human trafficking 4
3.2 Employees 5
3.3 Protecting the reputation of VIDEOTON Bulgaria 7
3.4 Fair business conduct 7
4. Organisational commitments 8
4.1 Accounting, accurate reporting and financial integrity 8
4.2 Responsible sourcing 8
4.3 Information security, trade secrets, intellectual property and personal data protection 9
4.4 Safe and healthy working environment 10
4.5 Sustainable development 10
4.6 Fair employment, working conditions and living wage 10
5. Company assets 11
6. Media relations 11
7. Reporting ethical concerns 12
8. Review, accountability and management system 12

1. Introduction

A commitment to ethical conduct and a solid ethical foundation are the most important elements of the activities of VT DZU AD, VIDEOTON Bulgarian Holdings EOOD, VEAS Bulgaria EOOD and VT Bulplast EOOD (jointly referred to below as "VIDEOTON Bulgaria"). Our performance would be inconceivable without well-prepared and ethically committed employees, whose primary duty is to perform their work in full compliance with legal, moral and professional rules.

VIDEOTON Bulgaria supports and applies the Responsible Business Alliance (RBA) Code of Conduct as the reference standard for its own operations and its supply chain, and builds on its requirements in line with applicable Bulgarian and European legislation. Where the RBA Code, the legislation and this document differ, the most stringent requirement applies.

We respect internationally recognised human rights and are guided by the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization. This Code is a key element of our human rights due diligence process in respect of our own operations and our supply chain. We expect our suppliers and business partners to comply with this Code or an equivalent standard and to apply the same requirements throughout their own supply chains.

The Code of Conduct and Ethics sets out the fundamental corporate values that shape the day-to-day work of our companies and underpin our internal and external relationships. All employees are required to familiarise themselves with this document and to follow its rules, both in their professional conduct and in their private conduct insofar as it affects the reputation of the companies.

We provide accessible channels for reports and complaints (grievance mechanism) concerning breaches of the Code, in accordance with Section 7, open to employees, suppliers and other stakeholders, and we do everything possible to protect the reporting person from discrimination and unfair treatment. We prohibit retaliation or any adverse consequences against anyone who reports an actual or suspected breach in good faith.

The heads of the companies have primary responsibility for setting a personal example in complying with the Code and for promptly resolving any ethical issue arising in their company. Employees are required to cooperate in the investigation of any alleged breach. Inappropriate conduct that is inconsistent with the Code constitutes a breach of work discipline and may lead to disciplinary proceedings under the Labour Code and the imposition of an appropriate sanction.

2. Scope

The provisions of the Code of Conduct and Ethics apply to all employees of the VIDEOTON Bulgaria companies, including temporary workers, workers provided by staffing agencies, migrant workers, trainees and interns.

The requirement to comply with this Code or an equivalent standard is included as a contractual clause in our relationships with suppliers, contractors, subcontractors and other business partners.

This Code forms part of VIDEOTON Bulgaria's system of internal policies on ethics, human rights, sustainable development and labour relations, and is applied in conjunction with them.

3. Ethical values

The core values of VIDEOTON Bulgaria are respect for human dignity and privacy, respect for others, fairness, integrity, responsibility, reliability and appropriate conduct in compliance with the law.

3.1 Child labour, forced labour, modern slavery and human trafficking

VIDEOTON Bulgaria believes in the dignified treatment of all people, and we work to build a culture of respect, ethics and social responsibility.

Any form of child labour, forced labour, modern slavery or exploitation is unacceptable and incompatible with our values. We encourage all our suppliers, business partners and customers to share our dedication to this important cause and to work together with us, agreeing to comply with our Code and with all applicable laws and regulations prohibiting these practices.

VIDEOTON Bulgaria aims to provide a safe and fair working environment for everyone, including migrant workers, who are to receive an employment contract in a language they understand before leaving their home country, and takes all necessary measures to identify and prevent human rights violations in our companies and their supply chains.

Action plan if child labour is identified at VIDEOTON Bulgaria:

- Immediately stopping the child labour and ensuring the child's safety and health;
- Notifying the Child Protection Department of the Social Assistance Directorate and the Ministry of Interior;
- Contacting the child's parents/guardians;
- Supporting the family in order to reduce its dependence on child labour;
- Introducing long-term measures to prevent future cases of child labour;
- Monitoring and evaluating the effectiveness of the measures taken.

Action plan if forced labour, modern slavery and/or human trafficking is identified at VIDEOTON Bulgaria:

- Immediately removing the worker from work and ensuring their safety and health;
- Notifying the Social Assistance Directorate and the Ministry of Interior;
- Maintaining contact regarding the worker's health and safety;
- Supporting the worker in being reassigned or finding employment;
- Introducing long-term measures to prevent similar cases in the future;
- Monitoring and evaluating the effectiveness of the measures taken.

3.2 Employees

Human rights: We are committed to respecting the dignity and human rights of all people and communities we come into contact with in the course of our activities. We condemn inhumane treatment, human rights violations and discrimination. Our managers and employees must treat everyone with dignity and respect. They must show respect for and acceptance of the religious, national, ethnic and political affiliation and the sexual orientation of others; refrain from racist behaviour and from disseminating content that could be interpreted as incitement to racism; unconditionally respect the constitutional and legal rights of others; and in no way use vulgar, indecent, offensive or defamatory language.

Discrimination: We strive to create a working environment in which individual differences are accepted. Any discrimination based on a person's actual or perceived characteristics is prohibited (such as sex, race, colour, nationality, national or ethnic minority, mother tongue, disability, health status, religious or philosophical beliefs, political or other opinions, marital status, maternity/pregnancy or paternity, sexual orientation, gender identity, age, social origin, property status, or the nature of employment, including part-time, fixed-term or other employment relationships).

Young workers: We verify the age of all candidates prior to hiring. Persons under the age of 18 employed by the VIDEOTON Bulgaria companies do not perform night work or overtime and do not carry out activities that could endanger their health, safety or moral development. We provide working students and trainees with appropriate support, training and supervision.

Working hours: Working hours comply with applicable labour legislation and do not exceed 48 hours per week, with at least one day off in every seven-day period. Overtime is voluntary, is permitted only where objectively necessary, does not exceed the statutory limits (6 hours per week for day work and 150 hours per year) and is paid in accordance with the Labour Code. Where the nature of the work allows, we offer our employees flexible working arrangements. We consider employees' requests for changes to the length or scheduling of their working time related to caring for a child or a relative in accordance with the Labour Code, and where a request cannot be accommodated, we give written reasons for the refusal.

Right to political activity outside work and freedom of association: We do not restrict our employees' political activity outside the companies, but political campaigning in the workplace is prohibited. In their individual political activity, employees may not use the names "VT DZU" and/or "VIDEOTON", nor may they create the impression that VIDEOTON Bulgaria supports a particular political party. In accordance with applicable law, our employees have the right to form or join trade unions. VIDEOTON Bulgaria ensures equal rights and opportunities for its employees, regardless of their political views or their membership or non-membership of trade unions.

Alcohol and drug use: We strictly prohibit our employees from performing their duties under the influence of alcohol or drugs, and from possessing, selling, buying or trading in illegal substances and drugs.

Workplace violence: VIDEOTON Bulgaria firmly opposes all forms of violence in the workplace, as well as threats of violence and any conduct that may cause fear or make employees feel unsafe at work.

The VIDEOTON Bulgaria companies have in-house security, and in the event of violence:

- Security intervenes to stop the violence immediately;
- The safety and health of employees are ensured;
- The Ministry of Interior authorities are notified of the violence;
- Disciplinary proceedings are initiated under the Labour Code;
- Long-term measures are introduced to prevent similar incidents;
- The effectiveness of the measures taken is monitored and evaluated.

Harassment: We expect all our employees to refrain from any form of harassment of colleagues or other persons they come into contact with in their work. Any conduct, whether verbal, non-verbal or physical, whose purpose or effect is to violate a person's dignity or to create an intimidating, hostile, offensive or humiliating environment is prohibited.

Sexual harassment means any act, verbal remark or written communication relating to sex and sexuality (physical contact, provocative or covert behaviour) that violates a person's sexual integrity or intimate privacy.

Offensive forms of communication: Those working at the VIDEOTON Bulgaria companies should address their colleagues and the organisation's partners in an appropriate, collegial manner. A condescending, arrogant, offensive or disrespectful manner of address is a breach of ethical standards in every case.

3.3 Protecting the reputation of VIDEOTON Bulgaria

Legal compliance: Our companies adapt to and strictly comply with the laws and regulations in force in the Republic of Bulgaria and the European Union. Compliance with the law is a fundamental requirement for our employees and partners.

Standard of conduct: As individuals, we are also responsible for creating and maintaining a good image. Our employees and partners should refrain from any action that could adversely affect the reputation of our companies. It is their moral duty to uphold the reputation of VIDEOTON Bulgaria and to represent it appropriately to the public.

Employees must not damage the reputation of VIDEOTON Bulgaria through statements or publications, whether oral or written, including on social media. This restriction does not apply to reports made in good faith in accordance with Section 7.

3.4 Fair business conduct

Business relationships: The cooperation of the VIDEOTON Bulgaria companies with other organisations is based on trust, mutual benefit and fair competition. We sell our products and services on the basis of their quality, compliance and competitive price. We do not provide misleading or false information to customers and suppliers, and every employee is personally responsible for complying with the applicable legal, professional and ethical rules.

Competition: Competition and antitrust laws govern how we enter into business relationships with competitors, customers, suppliers and other third parties. It is unacceptable to enter into agreements with a competitor on terms of sale (prices, discounts, credit terms, etc.), production standards or volumes, the allocation of customers or territories, or the boycott of a customer. The companies also refrain from abusing a dominant position, and employees must be aware of their responsibilities in this area in their day-to-day dealings with competitors and partners. We regularly review and monitor our partner organisations (customers and suppliers) for compliance with ethical standards.

Anti-corruption: Exerting influence or obtaining an undue or unlawful advantage in return for payment is prohibited in all circumstances. It is prohibited to offer, promise, give, request or approve any unfair advantage or benefit – whether monetary, non-monetary (e.g. a voucher) or in the form of a gift – directly or indirectly, in order to obtain an undue or unlawful business advantage.

Gifts and hospitality: We avoid any conduct that could create the impression of seeking, receiving or granting preferential treatment in exchange for personal or business benefits. Occasional gifts and hospitality may be offered in line with the standards of reasonable business etiquette, but our employees may not give or accept, directly or indirectly, anything whose value exceeds 10% of the current national minimum wage to or from any person or company that has business relations with us.

Conflict of interest: Employees may not engage in activities incompatible with their work and responsibilities, accept offers of personal gain incompatible with business ethics, or otherwise obtain personal advantage from their position. All business transactions are documented in a verifiable manner in accordance with generally accepted business standards. We welcome our employees' civic and community involvement, provided it is not incompatible with their position in the company.

4. Organisational commitments

4.1 Accounting, accurate reporting and financial integrity

The VIDEOTON Bulgaria companies prepare financial statements in accordance with generally accepted accounting principles and applicable legislation, and submit and publish them appropriately. All financial and other records of our companies accurately and in detail reflect our revenues, expenses, assets and resources. We condemn all forms of money laundering and are committed to entering into economic relationships only with partners engaged in lawful activities with funds from lawful sources. We are committed to fair taxation and refrain from tax avoidance practices.

Recording false, misleading or fraudulent data in any book, report or register of any of the companies is prohibited. Providing false information to public authorities and officials is likewise unacceptable.

4.2 Responsible sourcing

VIDEOTON Bulgaria, in cooperation with its suppliers, strives to comply with the provisions of this Code, which may include joint audits and on-site inspections to assess performance. We encourage all suppliers to apply the provisions of the Code within their own company and supply chain.

The VIDEOTON Bulgaria companies are committed to complying with all applicable rules, mandatory trade regulations and restrictions, including international sanctions prohibiting or restricting the sale, purchase, transfer of or access to goods, funds, services, software or information. We pay particular attention to compliance with the EU REACH Regulation and RoHS Directive.

We apply due diligence to the origin and chain of custody of the tin, tantalum, tungsten, gold and cobalt contained in our products to ensure that they are responsibly sourced. Our responsible sourcing also covers other minerals originating from conflict-affected and high-risk areas (CAHRAs), in line with the OECD Guidance. We ensure that members of

our supply chain do not contribute to the financing of armed conflict. Our sourcing policies prohibit:

- abuses associated with the extraction, transport or trade of minerals;
- direct or indirect support to non-state armed groups;
- direct or indirect support to public or private security forces;
- bribery and fraudulent misrepresentation of the origin of minerals;
- money laundering.

On request, we provide our customers with the supplier data collected for the relevant supply chain using recognised reporting templates (CMRT for 3TG, EMRT for extended minerals). Our detailed rules on conflict minerals are set out in the Sustainability Policy.

4.3 Information security, trade secrets, intellectual property and personal data protection

Corporate confidential information is information to which access is restricted and which is of particular importance to the companies' business – for example, data on customers, suppliers, competitors or trade secrets. All employees must keep such information confidential, must not disclose trade secrets or false information about the companies, their products and services, and must continue to observe confidentiality after the termination of their employment.

Employees refrain from sharing information relating to the group's business beyond what is necessary in the normal course of business or with persons outside the companies. Taking photographs or video recordings at VIDEOTON Bulgaria sites is permitted only where necessary for the organisation's business.

To ensure the integrity, confidentiality and availability of business information, we apply appropriate IT security solutions, and employees must not leave paper or electronic materials accessible to unauthorised persons and must follow the internal rules on data protection and data management.

VIDEOTON Bulgaria respects the intellectual property rights of third parties and does not engage in the unauthorised use, copying, distribution or modification of protected intellectual property. We respect the right of employees, partners, customers and others we work with to have their personal data processed properly and solely for legitimate business purposes, in accordance with Regulation (EU) 2016/679 (GDPR) and applicable personal data protection legislation, and we ensure its security through appropriate technical and organisational measures.

4.4 Safe and healthy working environment

VIDEOTON Bulgaria places emphasis on workplace safety. We provide clean, safe, physiologically and ergonomically appropriate working conditions that meet all regulatory health and safety requirements. We identify, assess and manage health and safety risks and provide employees with appropriate personal protective equipment. We provide regular training and briefings on occupational health and safety and fire safety, as well as easy access to clean sanitary facilities and drinking water.

Employees may report a workplace accident, occupational disease or hazard at work without fear of reprisal. All employees are required to protect their own health and that of their colleagues, keep their working environment clean, take care of working conditions and work equipment, and comply with the occupational health and safety rules laid down in internal, national and international legal provisions.

4.5 Sustainable development

In making operational and business decisions, we take economic, environmental and social factors into account and are committed to promoting sustainable development. We operate an environmental management system certified to ISO 14001. As a group of large industrial manufacturing companies, we consider it extremely important to contribute to the green economy; to track, measure and publicly report our greenhouse gas emissions and set specific targets for reducing them; to increase the share of energy from renewable sources; and to reduce specific energy consumption, water consumption and the waste generated by our activities. We apply circular economy principles where applicable. We reduce, reuse and recycle materials and resources, paying particular attention to meeting our present needs without compromising the opportunities of future generations.

VIDEOTON Bulgaria is committed to social responsibility for sustainable development. The scope of our support grows every year, mainly in relation to our industrial base in Stara Zagora.

4.6 Fair employment, working conditions and living wage

We are committed to equality in the workplace and to lawful and fair employment and remuneration practices. We comply with applicable requirements on minimum wages, overtime and mandatory benefits under labour and social security legislation. We provide equal pay for equal work and qualifications, regardless of gender. Individual pay is determined solely by the requirements and evaluation of the job, qualifications, professional experience and work performance.

We firmly oppose the direct or indirect use of child, slave, forced or compulsory labour in any form and condemn all forms of illegal, unfair and unethical employment that exploit the workforce, undermine the social security system or serve tax evasion.

We publicly commit to the principle of responsible recruitment (employer pays): we do not charge fees to candidates or employees at any stage of the selection process, for all categories of workers (permanent, temporary, local or migrant).

VIDEOTON Bulgaria is aware of the concept of a living wage and follows the development of good practice in this area, in line with the UN goals. We strive to ensure that our employees' pay is fair, and in all cases we comply with applicable legislation and the most stringent legal requirements on wages. We monitor changes in international labour law and guidance to ensure adequate pay. We keep a record of all payments, provide every employee with a payslip and pay wages by bank transfer, in full compliance with applicable regulations.

5. Company assets

All directors, managing directors, managers, heads of structural units and employees must protect the companies' assets (capital, tangible assets, facilities, equipment, personnel or other resources) and may not use them for personal purposes unless permitted by law or the companies' internal rules. In an emergency, human life and health always take priority over the protection of property.

6. Media relations

Contacts with the media are coordinated and organised by the Communications Specialist at VIDEOTON Bulgaria. If any structural unit receives a request for information from the media, it forwards the request to the Communications Specialist. Statements concerning VIDEOTON Bulgaria are made only after approval by VIDEOTON senior management, and statements concerning an individual company are made by its Managing Director. The topic of the interview or statement and any questions arising are agreed in advance with the representatives of the media outlet concerned. No one may make a statement about our partnerships without the consent of the partner concerned. In the case of an unplanned interview relating to a specific event, the Managing Director may make a statement at their own discretion and responsibility or designate an employee, including the Communications Specialist, to make a statement in compliance with the above principles.

7. Reporting ethical concerns

Anyone who becomes aware of an actual or suspected breach of this Code may file a report in accordance with the provisions of the Internal Whistleblowing Policy. The policy is available:

- on the companies' internal servers;
- in the My VIDEOTON application;
- on the VIDEOTON Bulgaria website www.videoton.bg

8. Review, accountability and management system

This Code is reviewed periodically, and at least once a year, to reflect changes in legislation, the business environment and good practice. The review is initiated and coordinated by the Sustainability Manager at VIDEOTON Bulgaria, with the participation of representatives of the units concerned, and any non-conformities identified are corrected promptly. The Managing Directors of the companies approve amendments to the Code.

Familiarisation with the Code is mandatory for all new employees on joining, and amendments are communicated promptly to all employees through the established internal channels.

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