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Dear colleagues,

Why LMP-Bulgaria OOD need Code of Conduct?

Just as in a real family there are basic rules that must be followed by each member. The larger the family, the more important it is to establish clear boundaries, because these give security in our relations with third parties.

Responsibility is one of our core values. It includes not only responsibility for energy and the environment, but also for our colleagues, business partners and society. It also includes compliance with applicable laws at all times and places, while respecting ethical values in a sustainable way. This Code of Conduct is designed so that we are all aware of our responsibilities and can act accordingly. It sets out the legal and ethical basic rules that we are committed to. It serves as a basic principle of our behavior and for the decisions we make, both within our company and in our relations with the outside world.

Everyone who works in LMP – BULGARIA OOD has the task to fulfill this responsibility and put it into practice in accordance with these provisions. As a result, it is very important for every worker to read this Code of Conduct carefully. We appreciate for your time and support, because it is in the interest of the company, and also for each individual.

### **1. Principles of the Code of Conduct**


- We comply with applicable laws and regulations, as well as internal guidelines.
- We commit to comply with basic ethical rules.
- In the performance of his / her official duties, the employee treats everyone kindly, politely and with respect, respecting the rights and dignity of the individual and not allowing any manifestations of discrimination.

We recognize and comply with national and international laws and regulations, as well as the internal corporate guidelines of LMP–BULGARIA OOD. Violations of them can cause significant damage to LMP–BULGARIA OOD, employees and business partners.

In addition to financial losses, legal consequences and significant loss of the company's reputation, violations can also lead to consequences in labor rights, civil rights and criminal liability of the employee.

This Code of Conduct applies to all person acting on behalf of LMP–BULGARIA OOD, including the manager and all person employed by the company.

Our Code of Conduct is publicly available on the website ([www.lmp.bg](http://www.lmp.bg)). It is important for us that our customers, suppliers and other business partners know about our concept of ethical business activity and share our principles of conduct.

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## 2. Professional behavior

- The employee performs his / her duties honestly and impartially, not allowing his / her personal biases to influence him / her professional behavior.
- The employee is obliged to observe the official hierarchy and strictly follow the acts and orders of the superior employees of the company.
- The employee presents to his / her manager openly and honestly the problems he / she faces during the processes of work.
- The documents and information in the company can be used by the employee only for the performance of his official duties in compliance with the rules for information protection.

## 3. Behavior towards colleagues and basic ethical requirements

- We respect and honor human dignity and do not tolerate harassment and discrimination.
- We approach each other with trust, respect, without prejudice, reliably, honestly and with dignity.

We respect the personal dignity, privacy and rights of everyone, regardless of factors such as ethnicity, culture, religion, age, skin color, sexual identity, ideology or gender.

Discrimination, harassment or other personal attacks on individuals will not be tolerated.

In our family culture we treat each other with trust and integrity, but also with freedom of speech, reliability, honesty. We are committed to our colleagues, energy and the environment.

These principles apply both to internal relationships and to the conduct of our external business partners and others.

## 4. Behavior towards competitors


- We adhere to the rules of free and fair competition.

## 5. Behavior towards business partners, officials and prominent political figures.

- We do not tolerate any form of bribery and corruption.
- We do not provide or accept any business services or monetary benefits that may affect business decisions.

We attach great importance to build good business relationships, which we promote with efficiency, quality and innovative solutions. We do not jeopardize our good reputation as a company of integrity by corrupt practices such as giving or accepting bribes or benefits.

We do not accept any benefits if this could give the impression that it is an attempt to influence relevant business relationships or decisions in an inappropriate manner. On the other hand, local

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traditions often require offering, giving or receiving reasonable and modest gifts, entertainment and other benefits. Such benefits are often necessary to establish or maintain business relationships, but may still be illegal under applicable regulations.

## **6. Conflict of interests**

- We always act for the best interests of LMP–BULGARIA OOD.
- We avoid conflicts of interest or end them in time.

In our daily work and business decisions, we are obliged to act in the interest of LMP–BULGARIA OOD, and not on the basis of personal, family or other relationships. Job position in LMP–BULGARIA OOD should not be used in bad faith for personal gain. Therefore, we expect all employees to avoid situations where personal interests may conflict with those of LMP–BULGARIA OOD. In the circumstance of a conflict or potential opportunity, staff must immediately inform the relevant supervisory authority or law enforcement officer in order to find an easy solution or eliminate the conflict of interest.

## **7. Confidential information / Company secrets and data protection**

- We keep the confidential information of our company, as well as keep the confidential information of other companies.
- We comply with applicable data protection laws.


The confidential information and trade secrets of LMP–BULGARIA OOD are subject to strict confidentiality. This is particularly true for business and marketing plans, technical knowledge of products, systems and production processes, customer data, financial information, remuneration information and more. Therefore, we consider this information as confidential and use it carefully to avoid any possible dissemination.

The personal data of employees and business partners are treated in strict compliance with regulations. We save, process and use personal data for lawful purposes and in accordance with regulations.

### **Financial integrity and protection of Assets**

- We are confident that the financial documents comply the accounting standards and reflect true state of the business.
- We respect and protect the assets of LMP–BULGARIA OOD, including intellectual property.
- LMP–BULGARIA OOD supports the fight against money laundering, fraud and tax crimes.

We provide careful and complete documentation of our business processes, this ensures that the financial and accounting statements comply the legal and specific accounting standards of LMP–

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BULGARIA OOD and reflect true state of business results. We never engage in fraudulent or other illegal activities and do not support money laundering.

We treat the property and assets of LMP – BULGARIA OOD carefully and use them only for their intended purpose. We protect them from loss, damage, abuse, theft, fraud and other violations. This applies to both tangible and intangible assets.

### **8. Environment, quality, safety and health.**

- We are responsible for energy and the environment.
- We are responsible for the quality of our products, systems and services.
- We provide a safe working environment that does not endanger health.

We are committed to constantly reducing the harmful effects on nature and thus to leave the ecological structure intact.

The quality of our products, systems and services is crucial to the success of LMP–BULGARIA OOD in the market.

Every employee takes his share of responsibility for quality and applies it in his own work, and constantly strive to supplement and develop quality. Managers are required to demand and implement quality requirements.


LMP-BULGARIA OOD and its employees are responsible for health and safety at work. To this end, applicable laws and regulations as well as internal safety standards must be strictly adhered to. Employees are also expected to show initiative to promote continuous improvement and be aware of risks.

### **9. Dealing with violations. Personal responsibility.**

- We are committed to adhering to and supporting the Code of Conduct.
- We do not tolerate violations of this code.
- We are responsible for integrity, and if in doubt, please ask for guidance.

Employees can report any practices and activities they deem inappropriate or even illegal under this code. Employees can report potential violations to senior management, including the manager, administrative staff (anonymously). Contact details can be found on the website.

Employees can rest assured that reported issues will be treated as confidential and investigations will be conducted. LMP-BULGARIA OOD does not tolerate any measures against employees who report violations and problems, but also protects the rights of unjustly accused person. Reckless accusation of other employees is not allowed, and such improper accusation also violate the Code of Conduct.

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To protect company LMP–BULGARIA OOD and its employees, any form of violations of the Code of Conduct are not tolerated.

**Other provisions**

§ 1. The Code of Conduct to be brought to the knowledge of the employees and workers, as a copy of it is placed in a prominent place in LMP–BULGARIA OOD.

§ 2. Every employee is responsible for the observance of the provisions of the Code of Conduct.

Approved by: Sandra Boshnakova