

## **Anti Corruption and Bribery Code of Conduct**

This Policy is applicable to every employee of Euromarket Group JSC and its subsidiaries (Euromarket), including senior executive and financial officers, and to members of the Euromarket Board of Directors. The reporting requirement of this Policy is also applicable to Euromarket's contractors and suppliers.

Euromarket Group JSC (together with its subsidiaries, "Euromarket" or the "Company") are committed to conducting business in accordance with all applicable laws, rules and regulations in Bulgaria and the highest ethical standards.

The Board of Directors have adopted a policy for the prevention of corruption and bribery in our business dealings:

- Adopted a clear policy of compliance with the law against any form of corruption and bribery in its business and emphasised its support for employees whose business actions actively enforce this policy.
- Endorsed this 'Code of Conduct'.
- Put in place a set of comprehensive management procedures dealing with all aspects of preventing and discovering corruption and bribery.
- Enforced monitoring and auditing the effectiveness of the Company's approach which will be kept under review.

### **Personal Responsibility**

As an Employee of Euromarket it is your personal responsibility to actively work to prevent corruption and bribery in our business.

This means:

- You must not promise, offer or give a bribe which could be in the form of hospitality or a gift intending to induce the recipient into improper conduct, such as favouring our company.
- You must not request, accept or agree to receive a bribe (payment or other advantage) in return for some preferential treatment.
- Actively try to prevent corruption and bribery; so apart from not doing certain acts you must work to uncover corruption and report incidents or concerns.
- You must not conceal or be a party to concealing any improper conduct.

Breach of the above would amount to a criminal offence and be treated as 'Gross Misconduct' under the terms of your contract of employment leading to summary dismissal.

Where you have responsibility for Staff (Line Manager) or as Head of a business unit it is also your responsibility to ensure that:

- Your staff is aware of the Corporate policy, Code of Conduct and the stance that the Company has taken.

- They understand what they have to do and their personal responsibilities for actively enforcing this policy.
- The consequences to them of breaching this Code of Conduct.
- You implement the Procedures that have been adopted and apply them to the conduct of your business.
- Our Partners, contractors and service providers are aware of our policy and procedures.
- You monitor the effectiveness of the procedures that we have put in place and report on this as required.

### Reporting Concerns and Incidents

Where an Employee has any concern that an offence is being committed or there is any suspicion of an offence being committed or of any improper conduct or suspicions of improper conduct he should report that to his line manager, Head of his Business unit or Board of Directors as appropriate. At all times such reports will be treated in strictest confidence and the member of staff so reporting such matters will at all times be protected.