

## COMPANY, CODE OF ETHICS FOR THE EMPLOYEES OF “BEST TECHNOLOGY” LTD. – 2022

Colleagues, 20 years have passed since the creation of “BEST TECHNOLOGY” Ltd. Together we have created and continue to work for the good name and image of our company. In the years of development, following the legal regulations in the Republic of Bulgaria and the European Community, we have created our own rules and norms of behavior. They describe the specific duties and mode of action of each employee of our company. In our fast-paced, dynamic everyday life, we often find ourselves in situations that do not obey precise rules and norms. It is necessary to make non-standard decisions that are fast and effective. That is why it is good to share a common Business Ethics whose main criteria are described in this document.

The CODE OF ETHICS is not intended to replace existing internal company rules and regulations, but rather to aid decision-making, relying on our own understanding of honesty and loyalty in our work at our Company.

**It is an honor for me to work with a Team of people – highly qualified, with a high moral value system and ideals, free, honest and honorable. People who preserve the principles of mutual tolerance, respect for others and themselves and strive to have absolute freedom of conscience.**



eng. Dimitar Stoytchev

Manager

## **1. TEAMWORK**

As a dynamically developing company in the “Private Security Sector”, “BEST TECHNOLOGY” Ltd. needs highly qualified specialists who are ready to work in a team with common goals.

We do not tolerate individual activities that are in conflict with the interests of the team. Everyone's activity should benefit the team, respectively the company. The information and knowledge we receive in the company should be shared and exchanged with our colleagues from the team in which we work. We must strive not to fall into the unique position of the only competent specialist. In such a case, the team and the company are solely dependent on us and our absence would cause losses to the company.

## **2. CONFLICT OF INTEREST**

Conflicts of interest may arise, both between individual employees, and between employees and the company. In such cases, we should be guided by the following principles:

- Not to use our position in the company for personal benefit or for the benefit of relatives and friends;
- Not to allow favoring of a source, counterparty, or supplier external to the company, even in cases where this seems completely isolated from our direct activity;
- To avoid any side activities that would affect our honest and objective position when making a decision on a given case;
- To strive to analyze each situation fully, putting ourselves from the position of the other side;
- Not to approach prejudiced before our personal analysis.

## **3. BUSINESS CONDUCT OUTSIDE THE COMPANY**

Each Employee may perform a side business activity only if this does not lead to a conflict of interest with “BEST TECHNOLOGY” Ltd. Our activity should in no way affect our work in the company. To avoid any current or future conflict, I recommend that the Employee share his or her intentions for a side business with the MANAGER of the company. A side activity cannot be performed if it is the result of knowledge acquired in “BEST TECHNOLOGY” Ltd. Employees must not engage in activities that directly or indirectly interfere with the work at “BEST TECHNOLOGY” Ltd. Employees may not develop a side activity that is illegal or damages the prestige of the company.

## **4. THE COMPETITION**

Competition in the “Private Security Sector” is constantly intensifying, it is a part of the market climate and we must comply with it. We must monitor the development of competitors and share with each other and with the Management all their actions. We must treat competitors with respect and dignity. Their complete slander and denial is not perspective and contradicts with business ethics. The approach of negative comments against competitors is not good. Ethical and profitable behavior is to highlight the advantages of Our products and services, as well as Our Company as a whole.

## **5. THE ROLE OF THE MANAGER**

In Our activity, everyone is free to act independently and there is scope for individual expression. Teamwork, however, requires the necessary subordination. The manager needs to have authority, which is built on the basis of professionalism and personal qualities. He is expected, on one hand, to have the ability to specify ways to achieve the company's goals, and on the other hand, to give a win-win solution to any difficult situation. The most difficult part of the Managers's duties is to fulfill his role as a Leader who knows how to impose behavior, set a personal example, provide the necessary help, protect his people and when necessary – does not hesitate to sanction them.

Ideally, the Manager proves himself to be the leader of the team, and this is achieved when the team feels the benefit of their Manager. The manager must combine a number of qualities – to protect the interests of the Employees from the team, the team as a whole and the company.

Given the nature of the work in the company and the high intellectual level of the employees, authoritarian management methods are not recommended.

## 6. RELATIONSHIPS

The relationships between employees in the company play an important role in shaping the working environment. We must not forget that most of the time during the day is spent among the Colleagues. A good tone and relationship is a necessary condition to feel comfortable in the workplace. Raising your voice and ignoring the norms of cultural communication with a client or colleagues is absolutely undesirable. Highlighting one's own merits and publicly displaying the complexity of the problems of one's own activity is not tolerated.

It is important for each of us to treat others as we would like to be treated.

## 7. PROPERTY OF THE COMPANY

Company property should be treated as Our property. The cars, the tools, the equipment are important for carrying out our work, the activity of the team and the whole company. Dishonest treatment of PROPERTY interferes with the work of Our colleagues and is contrary to good relations. It is the duty of each of us to use the company's resources as intended, to protect them from damage, loss or theft. Company property may not be sold, exchanged, rented or used for personal use without Management approval. Unauthorized use of company materials and equipment without permission is inadmissible. Such activities will be treated as theft.

## 8. LABOR DISCIPLINE

All of us, as employees of the company, are obliged to comply with the labor discipline, including compliance with the rules for working hours and vacations, the use of equipment and premises as intended, the compaction of the working day with professional activity. It is not allowed: "SURFING" or viewing sites on the INTERNET for personal purposes, except during scheduled breaks. Delays and non-compliance with working hours. The consumption of alcohol and intoxicants during working hours on the territory of the company. Use of communications (Internet, telephones, etc.) for personal needs or participation in side activities. Distribution of materials not related to the work of the company. Out-of-hours presence on company premises must be done only with the knowledge and approval of management. All External Visitors (or your acquaintances) can only be received in the "Seating Room" of the company or outside the office.

## 9. HEALTH AND SAFE WORKING CONDITIONS

Each Employee is responsible for his own health and the health of his Colleagues. Compliance with labor safety standards is a necessity. The policy of the Management of "BEST TECHNOLOGY" Ltd. regarding health and safety at work, includes:

- **RISK IDENTIFICATION AND PREVENTION:** Preventive examinations and checks are carried out by Occupational Medicine Services to identify hazards and assess the risk to health and safety at work, on the basis of which measures are determined and resources are provided for its control.;
- **COMPANY MANAGEMENT:** Seeks to effectively manage health and safety risks, minimize risks to personnel;
- **COMPLIANCE WITH THE STANDARDS:** It is a necessity for occupational safety. "BEST TECHNOLOGY" Ltd. strictly complies with the applicable legal and other requirements related to the identified hazards and the assessed risks for health and safety working conditions.;
- **AWARENESS:** The company has a built-in system for awareness through briefings and training of employees with the aim of strengthening personal responsibility for compliance with safe and healthy

working conditions. The immediate reporting of all incidents or the risk of such incidents to management is mandatory.;

- **CONTROL:** We strive to continuously improve the working environment in compliance with the current requirements of Bulgarian and European legislation. The goal is to achieve a high quality of the activities carried out, to protect the health and working capacity of its Employees, but also of all Visitors located on the territory of Our company offices, in order to meet the expectations of society. Every Employee is obliged to inform the Management in case of illness, risk of injury or prerequisites for the occurrence of an occupational accident.

## 10. COMPLIANCE WITH ENVIRONMENTAL PROTECTION

Our goal is the continuous improvement of the work in terms of environmental protection. The Management's policy regarding environmental protection at "BEST TECHNOLOGY" Ltd. includes:

- **MANAGEMENT:** Effective management of all aspects of the activities carried out in "BEST TECHNOLOGY" Ltd. concerning the environment, in order to prevent and reduce their harmful impact. Management of end-of-use electrical and electronic equipment and its handover for recycling;
- **ECONOMY:** Strive for economical consumption of natural resources, electrical and heat energy;
- **COMPLIANCE WITH LAWS AND STANDARDS:** Strict compliance with the applicable Bulgarian and European legal and other requirements related to the identified aspects of the environment;
- **AWARENESS AND COMMITMENT:** Providing sufficient information, briefings and training to employees and strengthening personal responsibility towards environmental protection. Separate collection of household and industrial waste and their transfer for recycling. This policy should be considered as a minimum standard.

## 11. KNOW-HOW AND TRADE SECRET

Each company has its own KNOW-HOW and company secrets, which communicate with the concept – "CONFIDENTIAL, COMPANY INFORMATION". In our professional activity we have access to certain information, which is often a company secret. This can be a company document, rulebook, standard, plan or project for the development of commercial information for customers or suppliers, price schemes and others. It is inadmissible for a company secret or KNOW-HOW to be exported and made known to other people or organizations outside the company. We consider it illegal to use company information for personal gain. Exporting and providing technical or other information to third parties is punishable by law. Public statements and opinions about the company to the mass media without the permission of the Management is absolutely prohibited.

## 12. NON-DISCRIMINATION AND HUMAN RIGHTS

**NO DISCRIMINATION ALLOWED.** The company does not allow discrimination or favoritism on the basis of race, gender, religion, political affiliation, origin or affiliation. Any form of intolerance is unacceptable. When appointing a new employee, "BEST TECHNOLOGY" Ltd. pays attention only to the candidate's suitability (education, personal qualities, skills, experience and other related characteristics). The change in employment status is due solely to the personal qualities and professional activity of each employee in the company. The Company respects the personal beliefs/convictions of current and future employees. Sexual harassment or unwanted physical contact is absolutely unacceptable. Statements and actions contrary to the above principles are sanctioned.

- **FREEDOM OF ASSOCIATION AND RIGHT OF COLLECTIVE BARGAINING:** The company recognizes the right of employees to associate and be represented in order to pursue their legal interests. This right includes the right to have internal and/or external employee representatives recognized as partners in negotiations and consultations in accordance with the law, taking into account the needs, size and capabilities of the company.;
- **FORCED LABOR:** The company does not support or use forced forms of labor such as prison labor, debt addiction, human trafficking or slavery.;
- **CHILD LABOR:** We respect and honor the rights of the child, including the right to education, the right to rest and play, and the right to have their basic needs met. For this reason, we do not use or support the use of child labor.

### 13. PUBLIC AND POLITICAL ACTIVITY and FIGHTING CORRUPTION

“BEST TECHNOLOGY” Ltd. encourages the participation of its employees in public life, thereby helping to develop civil society in the Republic of Bulgaria. By assessment of the Management, the company may support public and political initiatives. We believe that it is necessary to observe the following restrictions: The public or political activity should be carried out during non-working hours and outside the company. An employee who performs an active activity that may lead to a conflict of interest must temporarily withdraw from the company. The company adopts the principle of conducting legal, ethical, transparent, socially responsible and socially engaged business.

**The policy regarding the fight against corruption and related phenomena includes:**

- **NON-TOLERANCE OF CORRUPTION:** The company does not tolerate any form of bribery or corruption. In particular, it is assumed to refrain from any actions and behavior that could be perceived as active or passive bribery. “BEST TECHNOLOGY” Ltd. is totally against corruption and illegal practices in all its forms and will not offer, pay or accept bribes (of any kind) or commit any corrupt acts in its dealings with the government, foreign officials and the commercial market. “BEST TECHNOLOGY” Ltd. does not engage in bribery or any form of unethical inducement or payment, including payments to facilitate procedures, and will not make political donations or spend funds for political and other similar purposes.;
- **NO TOLERANCE OF CORRUPTIVE BEHAVIOR:** The management of “BEST TECHNOLOGY” Ltd. does not tolerate Corrupt Behavior on the part of its staff, suppliers, business partners and state or municipal authorities, and in general on the part of everyone with whom it has business relations. All Company employees are covered by this Policy and must not offer, give, solicit or accept a personal payment, gift or favor in exchange for more favorable treatment or to obtain an illegal business advantage.;
- **CRIMINAL LIABILITY:** Employees of “BEST TECHNOLOGY” Ltd., who have committed a violation of the principles and rules laid down in the Policy and other external or internal company documents concerning this matter, are subject to inspection and measures are taken against them.

### 14. PERSONAL SECRET

In our daily work, each of us learns details of a personal nature about our Colleagues. The use of such information or the disclosure to THIRD PARTIES is inadmissible. Dissemination of information about salaries, bonuses, health status or other personal information is not approved. Unauthorized access to personal lockers, bags, correspondence, etc. is unacceptable. Accidentally overheard information of a personal nature should not be disclosed.

### 15. APPEARANCE AND PERSONAL CONDUCT

Your appearance and personal behavior are part of the image of “BEST TECHNOLOGY” Ltd. and are important even outside the company and during non-working hours. All employees must come to work dressed appropriately for their position. Clothes and shoes must be clean, neat, in good condition and an expression of good taste. All Employees from the company’s “Technical Teams” when coming to work must change clothes and use the given “Company Clothing” with “BEST TECHNOLOGY” Ltd. identification marks. The personal behavior of everyone everywhere should not harm the image of the company. Rude or impolite behavior in front of customers, colleagues or in a public place is unacceptable.



PREPARED BY:

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MANAGER