

ANTI-CORRUPTION POLICY OF "AREXIM ENGINEERING" EAD

Definition

Corruption is any form of abuse of power, official position or authority to obtain undeserved property benefit. Corruption in the sense of this policy covers a broader concept than the definition contained in art. 3, para. 1 of the Law on Countermeasures against Corruption and Confiscation of Illegally Acquired Property, since a perpetrator of corruption in the sense of this policy can be not only an official holding a public state office.

Target

At AREXIM ENGINEERING EAD, we do everything we can to avoid corruption while doing business, both within the company itself and in our work with external contractors and government bodies. Corruption can manifest itself in various forms such as bribery, promise to do or not to do something, payment of other's debts, unequal treatment, etc. For us, corruption is not only the compoundable act according to the Penal Code, but any form of abuse, gross violation of good commercial practice and moral rules and norms.

Field of application

All employees of "AREXIM ENGINEERING" EAD, as well as any person related to the Company who provides services or goods on behalf and for the account of the Company, including subcontractors, their staff and business partners, are obliged to comply with this policy. Failure to comply may result in disciplinary action being taken, which could lead to termination of employment with an employee or termination of contractual relations with a third party, regardless of criminal or administrative liability, if any, for the specific act .

1. Main risks and anti-corruption measures

1.1. A bribe

A bribe may include offering or accepting cash, a cash equivalent (eg voucher), gift, credit, discount, travel, personal benefit, accommodation or various services. The employees and partners who act on behalf and at the expense of "AREXIM ENGINEERING" EAD may not offer, provide, request or accept any advantages or benefits intended to influence the decision-making of other persons with with a view to achieving a business goal.

1.2. Payment for choosing a particular supplier

Payment for supplier selection is the provision of sums or other property benefit for the selection of a certain supplier, which "AREXIM ENGINEERING" EAD uses for the purchase of certain

raw materials, goods or the performance of certain services. Payment for supplier selection is prohibited.

1.3. Business gifts

Offering, giving or receiving any gifts, with the exception of those with a value of up to BGN 50, is considered a form of corruption.

Offering, giving or receiving cash or cash equivalents, other than those with a value of up to BGN 50, is prohibited.

1.4. Events and meetings

Organizing events and meetings with clear business objectives does not qualify as a form of corruption.

Organizing or accepting invitations to business events outside of normal business rules and commercial practice is prohibited.

1.5. Relations with the public sector

In all cases, each of the employees of "AREXIM ENGINEERING" EAD must be approached with caution when dealing with public officials and persons holding public positions. In all their dealings with them, the employees of "AREXIM ENGINEERING" EAD must strictly observe the relevant anti-corruption laws, namely: LAW on anti-corruption and confiscation of illegally acquired property, Criminal Code, etc.

1.6. Political donations

"AREXIM ENGINEERING" EAD prohibits making donations to political parties or officials in order to obtain their support for executive, legislative, administrative or other actions that may be favorable to the Company.

2. Evaluation criteria

In order to determine whether certain conduct should qualify as corruption, our employees or partners should consider the following:

PURPOSE: What is the purpose of a particular behavior? Is there a legitimate business purpose? Can third parties assume that this specific conduct is intended to unduly influence the decisions of certain individuals?

- CIRCUMSTANCES:** In what setting is the behavior observed? (For example, is it during or before a certain business decision is made? Is it during an auction or the like?)
- CONTENT:** Is certain behavior generally accepted in the business environment? What is the nature and value?
- RELATED PERSONS:** What is the role of the person affected by the conduct (eg executive in a large corporation, government official, etc.)?
- TRANSPARENCY:** Are all components of this behavior clear and open, or do stakeholders have any ulterior motives? Would they be willing to publicly acknowledge these intentions?
- FREQUENCY:** How often does this behavior occur?

3. Reporting

When an employee has become the subject of a corrupt act, or knows or has a reasonable suspicion of corrupt practices, he/she should report to the Executive Director.

Such reports will at all times be treated in strict confidence, so that those reporting such matters will at all times be protected and any bona fide request for advice or assistance will be fully supported by management.

Suppliers, subcontractors, consultants and other contractors of "AREXIM ENGINEERING" EAD, who become the object of a corrupt act by an employee of the company, or know or have reasonable doubts about corrupt practices in its activity, can report the case by means of a written report or a complaint submitted according to the communication procedure established by the company.

4. Final provisions

In all cases, the starting point for the observance and implementation of this policy must be the applicable law and in particular the LAW on combating corruption and confiscation of illegally acquired property, the Penal Code, the Commercial Law, the Law on the Protection of Trade Secrets, the Copyright Law and related rights, etc.

"AREXIM ENGINEERING" EAD takes serious measures against those who violate the above-mentioned rules. For such violations, the strictest disciplinary measures are applied and signals are sent to the competent authorities by the Executive Director, in case there is evidence of a crime or administrative violation.

City. Smolyan 17.06.2022

I AFFIRM

EXECUTIVE DIRECTOR /  /

