

CODE OF ETHICS
of
Information Services JSC

This Code of Ethics is binding for the employees of Information Services JSC as a minimum mandatory standard in the performance of their professional duties.

I. DEFINITIONS

Information Services JSC is hereinafter referred to as the Company.

Employees are all employees, trainees and contractors under freelance contracts with the Company.

II. BASIC PRINCIPLES

Employees should be guided in their work by the principles of professionalism, high professional and personal ethics, corporate culture based on teamwork and common goals, confidentiality and lawfulness. Integrity towards customers, colleagues, the Company, business partners, as well as towards competing companies, should become a norm of behaviour applicable in their professional life.

All circumstances that could compromise the above principles should be avoided.

The Company's Code of Ethics (hereinafter the Code) defines and facilitates the realization of the core values of Information Services JSC. The Code provides key rules of conduct consistent with the Company's business values.

The Code applies to all employees working for Information Services JSC.

III. CORPORATE CULTURE AND COMPANY IMAGE

1. The conduct of the Company's employees, both at their workplace and outside it, shall in no way adversely affect the Company's position in society and the business market, or undermine its prestige and good name. Employees of the Company shall observe the laws and customary rules of conduct in the Republic of Bulgaria both at work and in their behaviour in the community outside work. The conduct of the Company's employees in and outside the workplace in the course of performance of their duties shall conform to the accepted corporate culture and generally accepted European standards of ethics and morality.
2. Internal relations within and between the individual structural units are considered to be a very important element of employee behaviour. It is undesirable to create tension between them. In case of creating tension and conflicts, the parties in the dispute should be consulted by a supervisor, Human Resources Department, in order to avoid misunderstandings and adverse effects for the Company's operations, and to avoid affecting the interests and prestige of the customers.
3. The privacy of the Company's employees is inviolable, but Information Services JSC expects them to manage their financial and personal affairs in such a way as to avoid compromising the Company.
4. Employees are required to create and maintain a high quality of service to customers and partners. Key elements of this quality are:
 - - Fast response and offering adequate solutions to customers and partners
 - - Ability to understand customer needs
 - - Accurate response to customer needs
 - - High quality internal and external communication throughout the work process

- - High quality of internal services provided from unit to unit
5. In the performance of their duties, employees shall treat colleagues and customers with esteem, respecting the dignity of their persons and refraining from any discrimination.
 6. When serving customers and interacting with colleagues, employees should not provoke conflict situations by their behaviour, but should seek to stop them when they arise by trying to remain calm and control their behaviour.
 7. When working with clients and interacting with colleagues, any form of threats, insults, psychological pressure or physical violence is unacceptable.

IV. INTELLECTUAL PROPERTY AND PRIVACY OBLIGATIONS

Information Services JSC respects the intellectual property rights of others and expects other companies to respect Information Services JSC's intellectual property rights as well. An essential element of protecting the Company's intellectual property rights is maintaining confidentiality with respect to trade secrets and confidential information. Products owned by the Company, confidential information, documents or other materials copyrighted by Information Services JSC may not be used without the written permission of the Company or outside the scope of the relevant contract entered into with Information Services JSC. The software owned by Information Services JSC may not be copied. Parties to contracts with Information Services JSC must not use confidential information, proprietary technology or third party software, documentation or other materials without permission.

The parties to contracts with Information Services JSC shall protect confidential information by not distributing, publishing, using or disclosing it except to the extent necessary for the performance of the activities under the relevant contract or as permitted by the Company. Information Services JSC complies and requires its partners to comply with applicable data protection standards. Material that contains confidential information or is protected, under data protection standards, must be stored securely and shared only with employees within the organisation, adhering to the need-to-know principle.

Confidential information may include, but is not limited to: source code, software and other developments (regardless of the stage of development) created or licensed by or to Information Services JSC, marketing plans, competitive analyses, product development plans, potential contracts, business plans, financial plans and forecasts, internal business processes and practices, and customer and employee information, including compensation and personal data.

V. DISCLOSURE POLICY

Employees of the Company shall not make contact with or make statements to the media on behalf of and for the Company unless specifically authorized thereby.

The dissemination of information in the public domain regarding the Company should only be carried out by authorised persons.

Unpublished information which may influence the Company should not be disclosed or used in transactions without prior authorisation from the CEO.

Employees of the Company may exercise their political rights within the limits of the law, and in the performance of their professional duties, they should refrain from making statements on political subjects, as well as from making political predictions related to any type of election.

VI. COMPETITION

Information Services JSC seeks to ensure that users benefit from the existence of competition and does not engage in agreements with competitors for:

1. fixing or controlling prices, whether by direct negotiation with competitors or otherwise through third parties;
2. organising the submission of bids in such a way as to direct the award of a contract to a particular competitor or reseller, including refraining from submitting a bid or submitting non-competitive bids;
3. boycotting suppliers or customers;
4. dividing or allocating markets or customers;
5. restricting the production or sale of products or product lines.

VII. BENEFITS AND BRIBES

Information Services JSC prohibits the giving of money or the granting of any benefit of a tangible or intangible nature, either directly or indirectly, to a public employee or to his spouse, person with whom he is in a de facto cohabitation, child or other relative, in order to influence him or to secure an action or decision of a public employee or to obtain an unfair advantage for the Company.

"Benefit" means any income in money or property, including the acquisition of shares or stock, and the granting, transfer or waiver of rights, the receipt of goods or services for free or below the market rates, the receipt of privilege or honours, aid, vote, support or influence, advantage, receipt of or promise of employment, position, gift, reward or promise to avoid loss, liability, penalty or other adverse event.

VIII. RELATIONS WITH THE STATE ADMINISTRATION AND MANAGEMENT BODIES IN THE REPUBLIC OF BULGARIA. LOBBYISM

When interacting with government officials or public sector employees:

- The Company shall not attempt to obtain, either directly or indirectly, from any source, information relevant to a procurement that is not publicly available or otherwise disclosed by the contracting authority; confidential, internal information of the contracting authority; or any information proprietary to a competitor, including, for example, information about its bid in the course of the procurement or in other circumstances where there is reason to believe that disclosure of such information is not permitted;
- The Company shall ensure that invoices are issued in accordance with all regulations relating to invoicing and payment;
- The Company does not provide or offer, either directly or indirectly, gratuitous services, gifts, patronage or anything of monetary equivalent, to any government or public sector employee, unless permitted by applicable law. The Company has established and maintains internal pre-expenditure controls to ensure compliance with applicable rules that prohibit the offering of benefits to government officials and public sector employees;
- The Company does not give, attempt to give, offer or solicit bribes, either directly or indirectly, to obtain or secure for a third party favourable treatment in connection with any transaction;
- The Company does not pay, and does not participate in any payment arrangements, either directly or indirectly, for the purpose of obtaining a contract with the government or influencing government action. The Company may not receive any payments or engage in any arrangements to influence or make corresponding payments with respect to any transactions involving public sector end users of services (including, but not limited to, public higher education, public health care and utility service organizations).
- - "Lobbying" may include influencing laws, policies and rules in government, as well as activities related to public procurement and business development. The Company does not endorse lobbying or participate in any of its possible forms.

IX. ELIGIBLE ENTERTAINMENT COSTS

Information Services JSC exercises discretion and care to ensure that the entertainment costs it incurs are reasonable, customary and appropriate. The Company ensures that the entertainment costs it incurs cannot be regarded as bribery or an immoral attempt to secure unfair advantageous treatment or a breach of applicable regulations. The guiding principle as to whether a particular entertainment cost is appropriate should be whether its public disclosure could cause embarrassment to the Company or the recipient. The Company shall ensure that the receipt of gifts or entertainment costs by its employees/contractors under management and control contracts is appropriate and cannot be viewed as an attempt by the offering party to secure favourable treatment or otherwise violate applicable law.

X. CONFLICT OF INTERESTS AND COMPETITION

Information Services JSC avoids situations of conflict of interest in which circumstances arise that may cast doubt on the Company's ability to act objectively in its relations with its partners, clients, government authorities, institutions and state administration. In the event of an actual or potential conflict of interest with a client or its employees, the Company shall notify its client of the situation.

Information Services JSC competes ethically for all business opportunities.

XI. EMPLOYMENT RELATIONS

Information Services JSC complies with the principle of equal employment and business opportunities without regard to, but not limited to: race, religion, nationality, gender, age, disability, marital status, genetic information, political affiliation, sexual orientation, and other characteristics, in accordance with applicable law. The Company prohibits workplace violence in all its forms and makes efforts to create and promote a pleasant work environment. Any prospective employee approved for employment after a fair interview shall receive an offer of employment, which shall include a basic monthly salary and other significant elements characterizing the employment relationship between the parties.

XII. EMPLOYEE DEVELOPMENT

Information Services JSC makes efforts to improve teamwork, communication and feedback, stimulates professional training and qualification improvement by providing its employees with training, programs (Graduation Program) and other opportunities. The Company organizes events aimed at improving team interactions, encourages creativity, professional development and proactive thinking (through training, role plays, team building, etc.).

XIII. APPEARANCE, DRESS CODE AND MANNERS

1. The dress and appearance of the Company's employees shall conform to the generally accepted business style adopted in the performance of daily professional duties, to the strictly formal style in the case of protocol events, and to the sporty-elegant style in the case of group corporate appearances.
2. The following are prohibited: reporting for work with ragged or unkempt clothing and/or shoes, unwashed and uncombed hair, piercings on visible parts of the body, except wearing earrings in the generally accepted manner.
3. The Company's dress shall not be out of good taste. The Company:
 - Requires courteous treatment between colleagues - supervisors, subordinates, contractors, and between employees/contractors and customers.
 - Encourages giving correct information and feedback.
 - Encourages courteous and open communication, prohibiting the use of abusive tone and language, physical and mental abuse.

XIV. ADVERTISING AND MARKETING

Information Services JSC does not support unfair competition and concerted practices between traders, such as: damage to the reputation of competitors; misleading; misleading advertising; comparative advertising; imitation; unfair solicitation of customers; direct or indirect fixing of prices or other commercial terms; allocation of markets or sources of supply, as well as other forms specified in the Law on Protection of Competition.

XV. ENVIRONMENT, OCCUPATIONAL HEALTH AND SAFETY

Information Services JSC takes as its social responsibility the protection of the environment. The company works to reduce the consumption of resources, including raw materials, energy and water, throughout the life cycle of the product or service. The company runs a campaign "Recycle paper and plastic in the office". Paper and plastic waste is disposed of separately at designated locations in the offices of Information Services JSC. The collected paper and plastic waste is transported to a collection point every week. In this way, the Company takes care of the environment and participates in solving environmental problems.

Employees' health, well-being and safety at work are also important to the Company. The Company establishes and maintains healthy and safe working conditions and complies with the applicable occupational health and safety laws. Through its policies and actions, the Company seeks to minimise risks arising from the working environment, prevent workplace accidents and promote healthy and safe working conditions.

XVI. VIOLATIONS OF THE CODE

The norms of the Code of Ethics have the force of internal rules and are binding for all employees of the Company, including persons on freelance contracts. Violation of the norms of the Code by employees will be considered a breach of labour discipline within the meaning of article 187, paragraph 10 and article 190, paragraph 1, item 7 of the Labour Code. Violations of the Code of Conduct by employees should be reported to the Head of Human Resources. Violations of the Code of Conduct by contractors should be brought to the attention of the relevant manager under whose responsibility the work to be carried out by the contractor falls.

Breaches of the Code of Conduct should be reported to the relevant line manager.