

ETHICAL  
CODE OF CONDUCT  
OF THE EMPLOYEES

SIRMA GROUP HOLDING JSC

CONTENTS

I. GENERAL ..... 2

II. RELATIONSHIPS WITH CLIENTS..... 2

III. PROFESSIONAL CONDUCT ..... 3

IV. PERSONAL CONDUCT ..... 3

V. EMPLOYEE RELATIONS..... 4

VI. CONFLICT OF INTEREST ..... 4

VII. INSIDE INFORMATION AND CONFIDENTIALITY ..... 5

VIII. EXECUTION ..... 5

## I. GENERAL

Art. 1. This Code sets out the rules of conduct for the employees of Sirma Group Holding JSC and aims to establish norms of ethical and professional conduct in all aspects of their activities, to prevent the possibility for misconduct and other illegal actions, thus increasing public confidence in their professionalism and morale, and strengthening the company's reputation.

Art. 2. The employment in Sirma Group Holding JSC is based solely on individual qualities and professional competence. We prohibit all forms of discrimination based on sex, age, race, nationality, religion, sexual orientation, or physical limitations.

Art. 3. (1) The work of the employees of Sirma Group Holding JSC is subject to the principles of legality, loyalty, professionalism, responsibility, and accountability.

(2) The employees of Sirma Group Holding JSC shall perform their official duties competently, objectively, and in good faith, in strict compliance with the requirements set in their job descriptions and the legislation in the Republic of Bulgaria, and with their overall behavior support the increase of trust of clients of the company.

(3) The employees of Sirma Group Holding JSC shall follow a conduct that does not damage the prestige of the company, not only in the performance of their official duties but also in their social and private life.

## II. RELATIONSHIPS WITH CLIENTS

Art. 4. In the performance of their official duties the employees of Sirma Group Holding JSC shall treat kindly and with respect each client of the company, as well as each person who has shown interest in the services offered by the company, and in the competence of their official function explain in detail their rights or direct them to the relevant competent employee.

Art. 5. The employees of Sirma Group Holding JSC, whose main function is to establish an effective connection with all clients of the company:

1. provide these persons with complete information to which they are entitled by law and in accordance with the signed contracts.
2. be responsible for the timely sending of the necessary documents and others.

### III. PROFESSIONAL CONDUCT

Art. 6. (1) The employees of Sirma Group Holding JSC shall perform their official duties professionally and responsibly, not allowing their personal interests or external factors to influence the quality of the performance of the assigned work.

(2) All employees shall come to work on time, in a condition that allows them to perform their official duties and responsibilities, not using alcohol or other intoxicants during working hours and use this time only to perform the assigned work with the required quality and within the set deadlines.

Art. 7. (1) The employees of Sirma Group Holding JSC are obliged to observe the hierarchy of the internal organizational relations established in the company, strictly observing the internal acts, the instructions of their immediate manager, and the management of the company.

(2) The employees of Sirma Group Holding JSC shall discuss the problems they face in the process of work with their immediate supervisors or with the management body of the company.

Art. 8. (1) The employees of Sirma Group Holding JSC shall not allow to be placed in financial dependence or other commitment by external persons or organizations, as well as ask for and accept gifts, services, money, or other benefits that may affect the performance of their official duties.

Art. 9. (1) In the performance of their official duties the employees of Sirma Group Holding JSC shall protect the technical means and materials entrusted to them with due care and shall not allow their use for personal purposes. In case of loss or damage of entrusted property, employees are obliged to promptly inform their immediate supervisor.

(2) The employees of Sirma Group Holding JSC do not disseminate confidential information and keep the good name of the company, as all information, including the one containing personal data, within the meaning of LPPD, to which they have access in their capacity as employees of the company, is used only for the performance of their official duties in compliance with the rules for information protection.

### IV. PERSONAL CONDUCT

Art. 10. (1) During the performance of their official duties, as well as in their public relations outside the workplace, the employees of Sirma Group Holding JSC shall adhere to conduct that does not impair the dignity of the person and the authority of the company.

(2) The employees of Sirma Group Holding JSC shall observe the decency and the business look in their attire, corresponding to their official position.

Art. 11. The employees of Sirma Group Holding JSC may not participate in events that are incompatible with the generally accepted principles of ethical conduct and which could damage their professional authority or the prestige of the company.

Art. 12. Art. 11. The employees of Sirma Group Holding JSC, depending on the positions they hold, may not perform activities specified in the legislation as incompatible with their obligations and responsibilities as employees of the company, as well as receive income from such activities.

## V. EMPLOYEE RELATIONS

Art. 13. (1) In their relations with their colleagues the employees of Sirma Group Holding JSC show respect and correctness, not allowing behavior that infringes on the dignity and rights of the individual, nor manifestations of discrimination.

(2) The employees of Sirma Group Holding JSC shall respect the opinion of their colleagues and shall comply with their right to privacy.

(3) All employees of the company shall comply with their hierarchical subordination within the established internal structure, not allowing abuses of their official position, expressed in exerting pressure or harassment in any form on subordinate employees.

Art. 14. When professional or work disputes between colleagues cannot be resolved by themselves, they seek assistance from their immediate supervisor.

## VI. CONFLICT OF INTEREST

Art. 15. (1) A conflict of interest occurs when the personal interests of employees, their close relatives or persons with whom they have close personal or business relationships differ from the interests of the company.

(2) The employees of Sirma Group Holding JSC shall strive to avoid any situations that give rise to a conflict of interest, and in the event of such they shall make the necessary efforts to terminate them by notifying their immediate supervisor.

(3) When assigning an official task, the performance of which may lead to a conflict between the official duties and their personal interests, the employees shall promptly notify their manager.

Art. 16. (1) The employees of Sirma Group Holding JSC may not use their official position to pursue their personal or family interests.

(2) The employees of Sirma Group Holding JSC shall not participate in any transactions that are incompatible with their position, functions and obligations.

(3) The employees of Sirma Group Holding JSC, who have left the company, shall not misuse the information that has become known to them in connection with the position they have held or the functions they have performed.

## VII. INSIDE INFORMATION AND CONFIDENTIALITY

Art. 17. (1) Inside information is any specific information, which has not been publicly announced, referring directly or indirectly to Sirma Group Holding JSC, the activity or clients of the company.

(2) Insiders are all persons who work for Sirma Group Holding JSC under an employment or civil contract and have permanent or incidental access to inside information relating directly or indirectly to the company.

(3) In order to prevent the possibility of misuse of inside information of the company, all insiders shall be obliged to observe the provisions of the law regarding the storage and non-dissemination of such information.

Art. 18. (1) The employees of Sirma Group Holding JSC are obliged to protect the data and personal information of all persons, which has become known to them during or on the occasion of the performance of their official duties.

(2) All employees of the company shall refrain from the dissemination and use for personal interests of information with confidential nature for Sirma Group Holding JSC.

## VIII. EXECUTION

Art. 19. In case of non-observance of the norms of conduct of this Code, the employees shall bear disciplinary responsibility according to the Labor Code.

Art. 20. Upon initial assumption of office, the immediate supervisor shall be obliged to acquaint the employee with the provisions of this Code.

The Ethical Code of Conduct of the employees of Sirma Group Holding JSC was adopted by the Board of directors of the company in 2015. The Code has been revised annually with the last update from 2022.

Representing Sirma Group Holding JSC:

Executive Director: