

Code of Conduct

Yettel Bulgaria, part of e& PPF Group

Yettel.

**A Message from
our leaders**

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A Message from our leaders





A Message from Balesh Sharma

Dear colleagues,

We have been telecom leaders in the various markets in which we operate for many years, touching lives and enabling communities; we have delivered many great results, and will continue to do so while pursuing our plans and digitally driven vision. At e& PPF Group we believe it is important to win, but what matters most is the way in which we do so.

In today's fast-paced world, shaped by disruptive technologies and constant change, it is more important than ever that we conduct our business with uncompromised ethics. Upholding integrity and transparency is essential to earning and maintaining the trust of our customers, suppliers, shareholders, and partners. We know that trust is hard to win, but easy to lose. A strong culture of accountability, integrity, and transparency helps us not only achieve business success, but also protects our strong brand and long earned reputation.

Our e& PPF Group leadership team is fully committed to setting the tone at the top. By demonstrating accountability and sound judgment, we ensure that ethical standards guide every decision we make. This commitment reflects our belief that doing good is good business. By this, we mean that our long-term success depends on serving our purpose, responsibly empowering customers, enabling progress, and supporting the communities in which we operate. When we do good, we create shared value that strengthens both society and our group.

Our e& PPF Group Code of Conduct provides guidance to help us all make the right decisions at work. It is up to each of us, from every employee, executive, and board member, as well as every person or entity that engages in business with the e& PPF Group, to embody our values through our actions.

I urge you to take the time to read, understand, and adhere to our Code of Conduct. Talk with your managers and colleagues about how our Code applies to your day-to-day activities as an e& PPF Group employee. If you have questions, concerns, or doubts, you should please make them known. Your voice matters and raising issues is an important part of protecting our culture of integrity.

Thank you for your continued commitment to helping the e& PPF Group achieve its goals while upholding the highest ethical standards. Together, we embody doing good is good business.

Balesh Sharma
e& PPF Telecom Group,
Chief Executive Officer



A Message from Bogdan Uzelac

Dear colleagues,

At Yettel Bulgaria, we have many reasons to be proud of what we achieve together. Our network has proven high quality, confirmed by several consecutive Best in Test certificates. As the first digitalised telecom in Bulgaria, we are setting a new standard for customer experience - one that is more modern, more intuitive and closer to people's everyday lives. The Top Employer certificate is also a recognition of the environment we are building - with opportunities for development and trust in people.

These results matter, but even more important is the way we achieve them. For us, "doing good is good business" means growing the company responsibly - with people in mind, with respect for the trust placed in us, and with responsibility for every decision we make.

Our values give us a clear direction. Being customer-obsessed means understanding customers' real needs and creating solutions that make their lives easier. Uniting as one means working with trust and a readiness to support one another. Daring to be bold means looking for new opportunities, while also taking responsibility for the choices we make.

This is where the Code of Conduct plays an important role. As part of e& PPF Telecom Group, we share a common standard of ethics and responsibility. It connects our values with the real situations we face in our everyday work - how we use technology and data, how we work with partners, how we communicate with one another and how we make decisions. In this way, it helps us stay true to our principles as we continue to develop as an increasingly digital and innovative company.

That is why it is important to apply it consistently - as a common standard of behaviour and personal responsibility for each of us, in every team and in every situation. In doing so, we protect the trust in Yettel and show what kind of company we want to be.

Thank you for contributing to our success every day - with professionalism, integrity and personal example.

Bogdan Uzelac
Yettel Bulgaria
Chief Executive Officer

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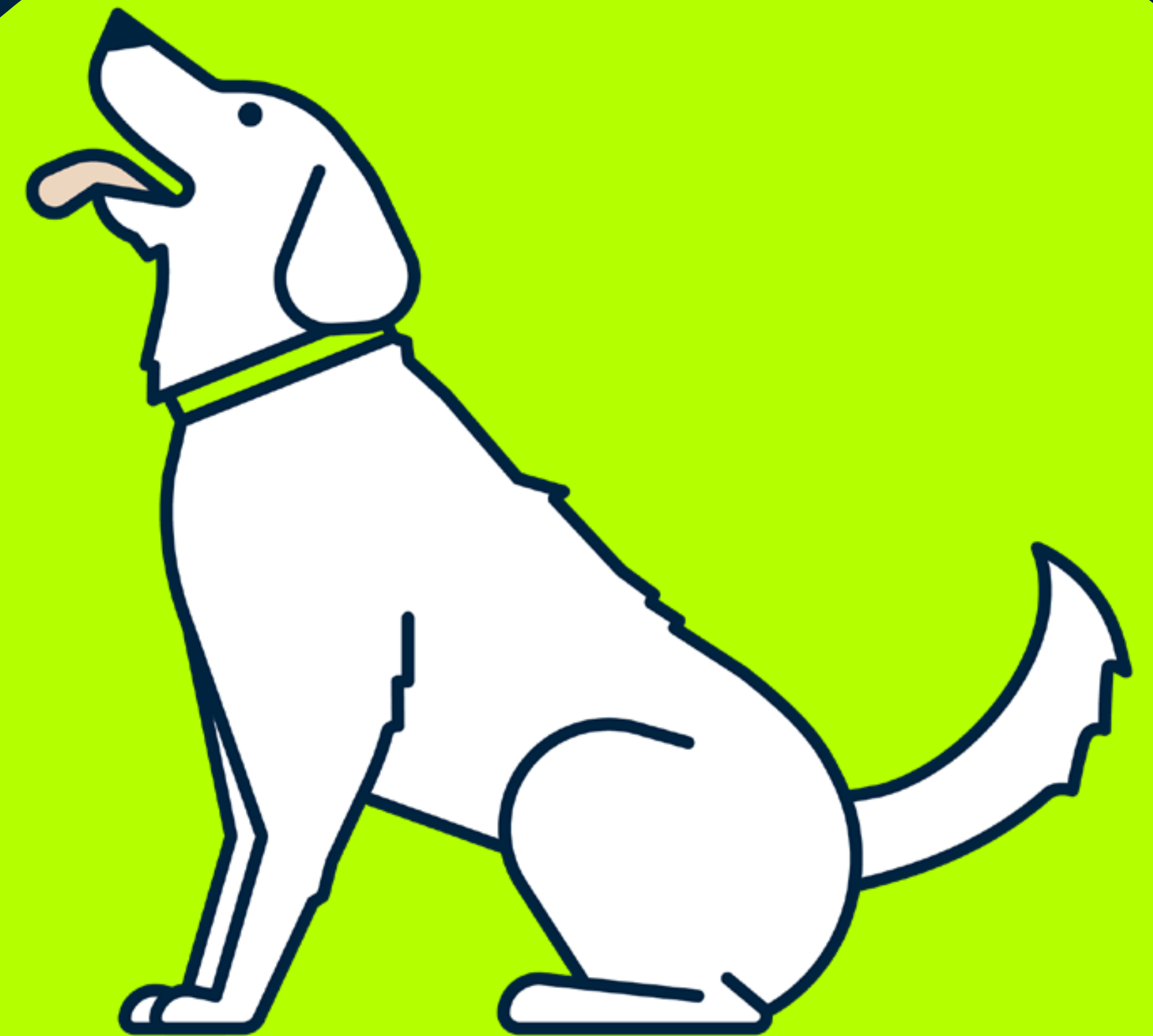
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Why We Have a Code of Conduct



This is our Code - it guides the choices we all make, so that our success is built on doing good.

At Yettel Bulgaria EAD ("**Yettel Bulgaria**"), we are fully committed to doing business in accordance with the highest standards of ethics and integrity, with professional business principles and in compliance with legal and regulatory rules and standards.

This Code of Conduct (this "**Code**") is our central policy document which outlines how all employees, executives, and board members (which are generally referred to as "**employees**" or "you" for purposes of this Code) should apply our values and behaviours. It provides an overview of the legal, regulatory and ethical rules and standards essential to achieve Yettel Bulgaria's objectives and uphold its values

for its operations. It also reflects the ethical rules and standards of our shareholder and ultimately e& and the PPF Group. Our Code sets out what we expect from every single person working for and with Yettel Bulgaria and underlines our responsibilities to our employees, executives, and board members, as well as our business partners, shareholders, and the communities where we operate. Our Code helps us make the right decisions and tells us where to go for more information.

There may be additional Yettel Bulgaria policies, manuals, procedures, guidelines, playbooks, instructions or other similar documents (together referred to as

"governing documents") that you need to adhere to, specific to your role or activities. If you believe that any such governing documents conflict with this Code, please notify the Ethics and Compliance team so that any such conflict is disclosed, assessed and resolved.

To ensure that Yettel Bulgaria complies with the highest legal, regulatory, and ethical rules and standards on an ongoing basis, our Code will be updated regularly. Please make sure that you comply with the latest version, which is available online at [Code of Conduct](#).

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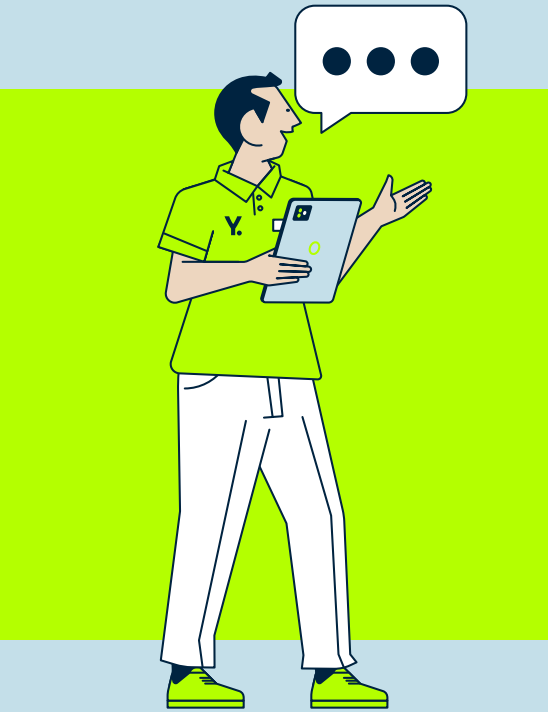
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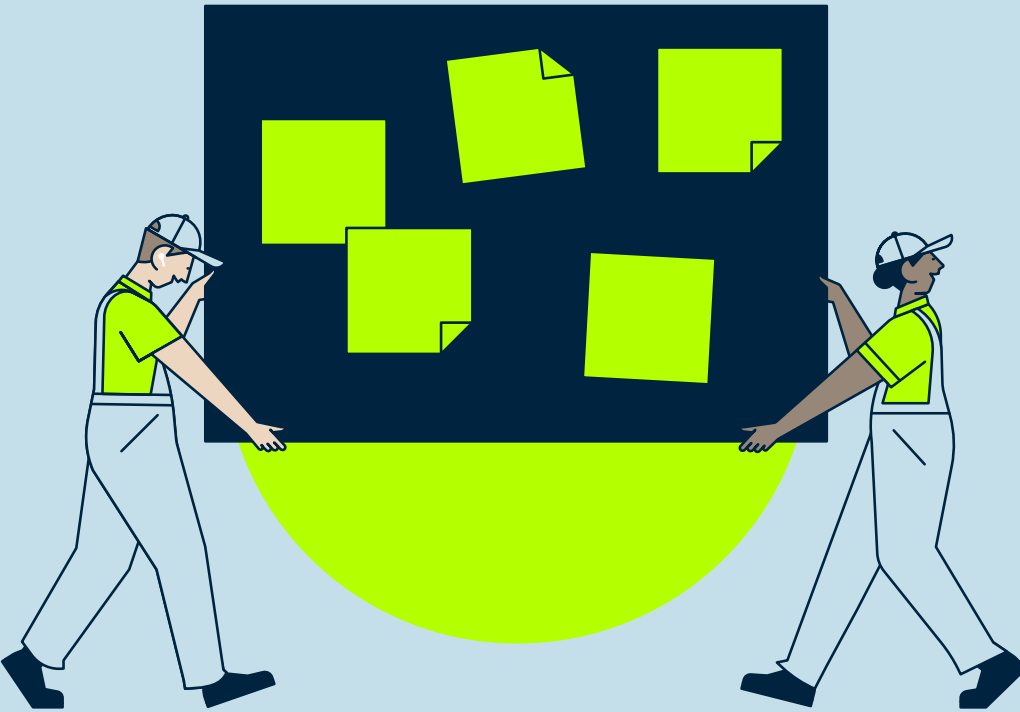
Our Values





Be customer-obsessed

- We're all about our customer, and we strive to make their lives richer and better. From the products to the prices to the insights-driven decisions we make for their benefit, customers are at the centre of everything we do.
- Every aspect of our work prioritize enriching customer lives through our products and services.
- Our strategies are driven by customer-focused research and insights aimed at understanding our customers' evolving needs.



Unite as one

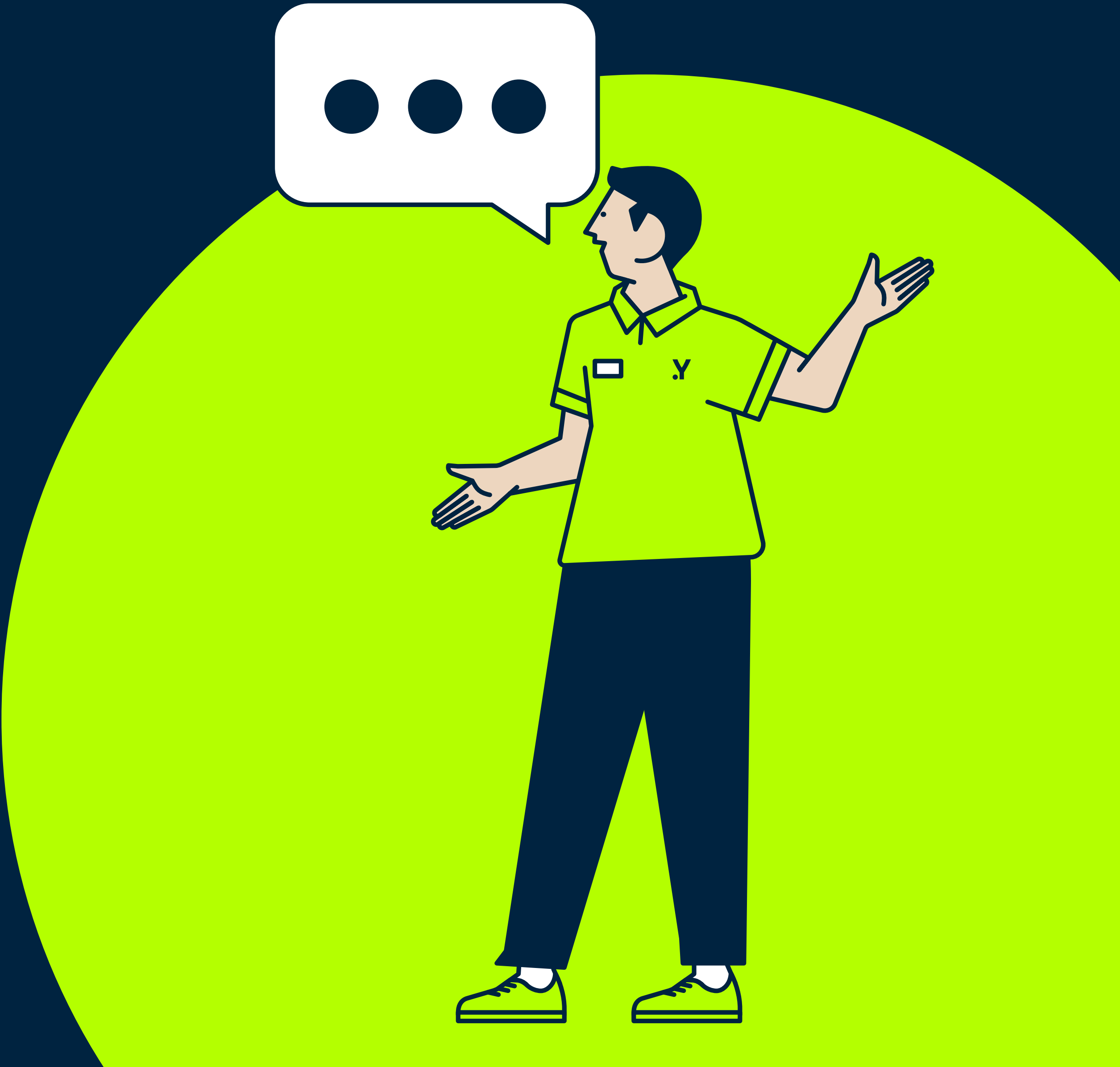
- We're unified both within and across teams, tackling tasks and challenges together and strengthening each other for the greater good of everyone. From trust to accountability to empowerment, collaboration is key to our present and future.
- Embodying unity, we tackle challenges collaboratively, uniting teams across departments to achieve common goals.
- Collective sharing of knowledge and resources is at the core of elevating everyone's potential.



Dare to be bold

- We're bold and fearless, experimenting with and investing in ideas that will keep us ahead. From immersing ourselves in technology to revolutionising the way things are done, all in pursuit of future-ready products and services.
- Courageously proposing bold ideas is how we push creative boundaries. We champion the spirit of brave, empowered decision-making unimpeded by the fear of failure.
- Leading with integrity, we own our words and actions to ensure our deeds reflect our commitment to innovation and excellence.

Our Responsibility



Our Responsibility

We want everyone working for and with Yettel Bulgaria, independent of role, rank, and responsibility, to comply with our Code in their day-to-day work and take actions that will preserve the trust that our customers and society place with us.

What our Code means for:



Our employees

As a Yettel Bulgaria employee you must make time to read our Code and understand what is expected from you. This includes behaving in ethical manner, taking pride in your actions and decisions. We expect you to apply our values in your day-to-day work and to comply with the principles and rules set out in our Code and all applicable governing documents.

Our Customers

Customer centricity is at the heart of our values. Our promise to our customers is that we will provide the highest quality of service and focus on consistently exceeding expectations.

Our Partners and Suppliers

Yettel Bulgaria is committed to doing business transparently and will respect the human rights of all stakeholders, including our partners, suppliers, and the broader community where we operate.

Our Commitment to the Environment

We have a responsibility to take care of the environment and to manage and minimise our impact on the environment. As part of this, we will take account of environmental responsibility as a factor in business decision making and will strive to work with our business suppliers and partners to ensure that they support our environmental objectives and work to reduce their impact on the environment.

We undertake for Yettel Bulgaria employees to review and acknowledge this Code annually and aim to perform periodic trainings on this Code for all employees, in order to reinforce the values that we set out in this Code.

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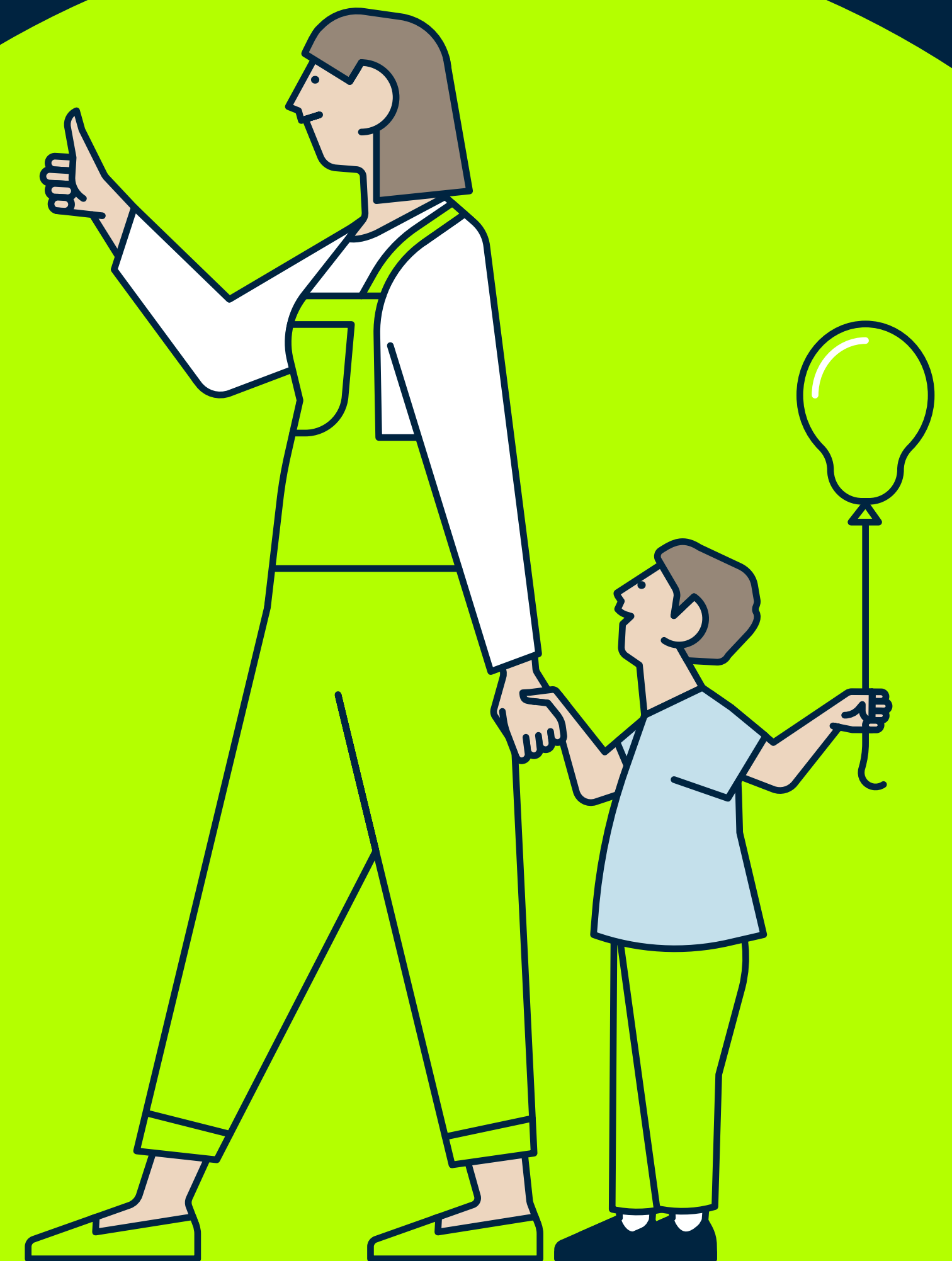
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Our leadership



Our leadership

At **Yettel Bulgaria**, our leadership is values-based, and this is crucial to ensuring an organisational culture which meets the highest standards of honesty, integrity and ethical conduct. Our senior leaders will strive to champion the culture that Yettel Bulgaria aims for and will demonstrate the organisation's values on a day-to-day basis and treat employees at all levels in a respectful and positive way.

Our managers and senior leaders are expected to act as role models by:

- Upholding a safe, positive, and ethical work environment.
 - Behaving and managing others in a way that honours Yettel Bulgaria's core values.
 - Hiring, promoting, and delegating in a manner that is legal and ethical.
 - Displaying integrity and transparency when handling challenging situations.
- Providing an environment for everyone to grow through continued learning opportunities.
 - Being alert to possible misconduct in the workplace.
 - Responding appropriately and in a timely manner to colleagues seeking help.
 - Maintaining accountability among all employees.
- Fostering an open-door culture where employees feel comfortable asking questions and raising concerns.
 - Preventing retaliation against employees who raise concerns in good faith or who participate in investigations.
 - Managing situations that may involve a conflict of interest by ensuring reasonable and appropriate resolution.



You can find more information and guidance to help you fulfil your responsibilities as a manager and role model for your team and colleagues on the internal networks of Yettel Bulgaria, in addition to the relevant governing documents.

If you have a particular concern or query on the application of any topics within our Code, please contact our Ethics and Compliance team at compliance@yettel.bg, or the Ethics and Compliance team of e& and the PPF Group at compliance@eandppftelcom.eu.

Working Together



How we treat each other

Yettel Bulgaria strives to create a working environment that respects diversity and gives employees the opportunity to learn, grow and develop their talents. Employees, in turn, must treat each other and third parties respectfully and fairly.

Yettel Bulgaria believes that everyone should be treated with dignity and respect, therefore,

Yettel Bulgaria prohibits all forms of discrimination, harassment (including any forms of sexual harassment), bullying, humiliation, threats of violence and abusive or offensive behaviour.

These behaviours are considered a serious act of misconduct and may subject you to disciplinary or legal action.

Everyoe working for and with Yettel Bulgaria, is empowered to take immediate action, in due process, regardless of role, rank or responsibility, when they see a situation that interferes with our Code and our standards of ethics and integrity. Of course, any such action must itself be carried out in accordance with the Code, the governing documents and all applicable laws.

Fostering a culture of Inclusion

At Yettel Bulgaria, we believe in creating an environment where everyone feels valued and empowered. We are committed to creating a more inclusive workplace where people, regardless of their different abilities, will have a chance to thrive, which is why we have adopted a Diversity, Equity and Inclusion Policy (DEI Policy) that is available on our website. Together, we unite to foster an inclusive, equitable environment for all. All employees are expected to treat everyone they interact with, whether it be colleagues, clients, or partners, with dignity, respect, and courtesy. Our employees have the right to work in a safe environment free from discrimination. By complying with our Code, you ensure that we create a workplace free from discrimination, bullying and harassment, where everyone can achieve their full potential. Inclusion is not just a value; it is an expectation of behaviour. All employees, contractors, and representatives are required to uphold the following principles in their daily conduct:

1.Embracing Diversity as a Strength

We believe diversity is our strength. Our goal is to impact lasting change through our actions and build a company that represents a variety of backgrounds, perspectives and abilities at all levels.

2. Fostering Belonging Through Collaboration

Creating spaces where all voices are valued and welcomed, contributions are acknowledged, and ideas are evaluated equitably, and all feel ewmpowered and connected. No one should feel excluded based on who they are or how they work.

3. Inclusive Communication

We are committed to fostering inclusive communication practices that ensure all employees, customers, and stakeholders can engage effectively and feel valued. Inclusive communication is integral to Yettel Bulgaria’s organisational culture, promoting collaboration, understanding, and respect across diverse groups.

4. Equity in Access, Opportunity, and Advancement

We are committed to identifying and removing barriers that prevent full and fair participation. This includes designing products and processes that are accessible to all and promoting equitable pathways for development, contribution, and leadership within Yettel Bulgaria.

Equal Opportunities in Employment

At **Yettel Bulgaria**, we treat our colleagues, candidates, clients, and business partners fairly and on merit. We prohibit any form of direct or indirect discrimination based on age, race, ethnicity, colour, sex, religion, national origin, social origin, disability, and any other characteristic protected by law.

We work together to make sure:

- there are no forms of unlawful discrimination in all aspects of employment including in recruitment, promotion, opportunities for training, pay and benefits.
- candidates for employment or promotion are assessed objectively against the requirements for the job.
- all employees are fairly compensated based on minimum wages allowed by laws and regulations.
- disability and personal or home commitments do not form the basis of employment decisions except where necessary.
- We support reasonable accommodations and flexible arrangements to ensure all employees, including colleagues of determination, can contribute fully and equitably.

We understand discrimination is not limited to in-person interactions, it can also be online via email, instant messaging, text, video calls, and posting comments on social media (including personal social media accounts).

Yettel Bulgaria recognises that training is an important factor in the promotion of diversity and inclusion at work and takes steps to increase employee awareness of the values and principles required to apply our Code in practice.

Bullying and Harassment

You have the right to feel safe, welcome, and comfortable as you conduct your day-to-day work. In line with our values, you should feel empowered to raise challenges and make complaints if you experience any behaviour that falls below this standard.

Bullying can take many forms; however, it is usually described as unwanted behaviour that is offensive, intimidating, malicious or insulting or an abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to someone. Power does not always mean being in a position of authority and can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal, and non-verbal conduct. Harassment can also take many forms but is often characterised by unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating and/or offensive environment for that person. It may be a pattern of behaviour or a one-off incident. It can happen anywhere including face-to-face, on social media or in emails or calls. Conduct may be harassment whether or not the person behaving in that way intends to cause offence.

We should remember that something, although intended as a "joke," may offend another person.

Different people find different words, actions or conduct acceptable and unacceptable. We each have the right to decide what behaviour is acceptable to us and to have our feelings respected by others. As a diverse organisation, it is important that we should all be respectful and mindful of each other's cultural considerations. We understand that any form of bullying and harassment can have very serious consequences for individuals and the organisation. Bullying and harassment may cause stress, unhappiness and/or affect health and family and social relationships and may affect an employee's work performance and could cause them to leave their job. Yettel Bulgaria will not tolerate conduct by any individual that amounts to bullying, harassment, physical punishment, or victimisation of another member of staff or third party; disrupts or interferes with another individual's work performance; or creates an intimidating, offensive or hostile environment.

We will treat any bullying, harassment, or victimisation as a disciplinary matter, which might lead to dismissal. Aggravating factors such as abuse of power over a more junior colleague will be taken into account in deciding what disciplinary action to take. If the harasser or bully is a third party such as a customer or other visitor, we will consider what action would be appropriate to deal with the problem. Serious harassment may be a criminal offence.

Sexual harassment

Sexual harassment is any unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated, even if this was not the intent of the person carrying out the conduct. It includes situations where a person is asked to engage in sexual activity as a condition of that person’s employment, or where a person is treated less favourably for either rejecting or submitting to sexual advances.

It includes situations which create an environment which is hostile, intimidating, offensive, degrading or humiliating for the recipient. All sexual harassment is prohibited whether it takes place within our premises or outside, including at social events, business trips, training sessions or conferences sponsored by Yettel Bulgaria. Anyone who is subject to sexual harassment should in the first instance, if possible and appropriate, inform the alleged harasser that the conduct is unwanted and unwelcome. Yettel Bulgaria recognises that sexual harassment may occur in unequal relationships (i.e., between a supervisor and their employee) and that there may be situations in which you may not feel able to inform the alleged harasser directly.

If you do not feel able to directly approach an alleged harasser, you should approach your HR Business Partner, another member of the Human Resources team or the Ethics and Compliance team. You may also report such issue in confidence or anonymously to Yettel Bulgaria’s whistleblower channels, as described in detail below.

What you can do to help

At Yettel Bulgaria we aim to create an inclusive environment, where everyone feels respected, valued, and confident they belong. We can all play our part by:

- **being aware of how your own behaviour may affect others and changing it, if necessary - you can still cause offence even if you did not intend to do so;**
- **ensuring that you pronounce and spell your colleagues’ names correctly;**
- **treating your colleagues with dignity and respect;**
- **taking a stand if you think inappropriate jokes or comments are being made;**
- **making it clear to others when you find their behaviour unacceptable;**
- **intervening, when and if possible, to stop bullying, harassment and discrimination you witness;**
- **reporting harassment or bullying to your manager, the Human Resources department or the various whistleblowing channels described in this Code, and reasonably co-operating in investigations; and**
- **supporting any colleagues who raise an issue relating to harassment or bullying.**
- **managers have a particular responsibility to fostering an inclusive culture by:**
- **setting a good example by their own behaviour;**
- **ensuring that employees feel supported;**
- **making sure that employees know what standards of behaviour are expected of them;**
- **intervening to stop bullying or harassment;**
- **reporting promptly via the relevant Yettel Bulgaria channels, any complaint of bullying or harassment, or any incident of bullying or harassment witnessed by them.**

Where can I go to for help?

- **If you believe you are being bullied, harassed, or discriminated against, this includes interactions with customers or suppliers of the Yettel Bulgaria or any other third party, you should raise a concern in accordance with our Code.**
- **The Yettel Bulgaria will take all complaints seriously and seek to deal with them promptly.**
- **The details of any action taken against the perpetrator as a result are usually confidential as between them and Yettel Bulgaria.**
- **Every effort will be made to ensure that anyone who makes a complaint about bullying, discrimination or harassment in good faith will not experience any detriment or be victimised because of making such a complaint.**
- **Any complaint of victimisation will be dealt with seriously, promptly and (so far as practicable) confidentially.**

Drugs and Alcohol

Yettel Bulgaria has a zero-tolerance policy regarding substance abuse of any kind, including the use or possession of illegal substances, or alcohol abuse. All employees are prohibited from being at work or on company business while under the influence of alcohol or other illegal substances. Further, Yettel Bulgaria prohibits weapons on its premises, consistent with applicable laws.

Health & Safety

We are committed to providing a safe and healthy working environment for our employees and safeguarding the safety and wellbeing of our customers, partners and the communities in which we operate.

We expect all employees and third parties working for or on our behalf to abide by the health and safety rules and regulations, and to intervene if they see any practices that are dangerous or unsafe.

We understand it is our collective responsibility to ensure we report incidents, hazards and near misses in a timely manner to help learning and prevention and report any violation of health and safety that may put others at risk immediately.

Our Business Principles



Our brand and Intellectual Property

We have recognised and valuable brands in the markets in which we operate, and we must take steps in protecting these valuable assets. We can protect our brands by complying with our applicable brand guidelines and reporting any suspected misuse of our logos and trademarks, including any unauthorized use, piracy, or misappropriation.

We should not allow any third parties to use our brands or logos without proper authorisation or consultation with the legal team of Yettel Bulgaria. Our intellectual property (such as trademarks, copyrights, know-how, patents, trade secrets, research, technical data etc.) and confidential information that belongs to Yettel Bulgaria and/or third parties is a valuable asset which in many instances sets us apart from our competition. If we do not exercise care or fail to protect and properly record this intellectual property, then we risk damaging the actual or potential value of, or otherwise losing, these assets.

Be aware of and safeguard any intellectual property and confidential information that is in your possession, whether it belongs to Yettel Bulgaria or a third party. The intellectual property of third parties can only be used with proper authorisation.

The penalties for infringement of either copyrighted materials (including software) or trademarks or other intellectual property of third parties are significant: failure to safeguard any intellectual property and confidential information can subject you and Yettel Bulgaria to legal and regulatory proceedings that may result in civil penalties (fines) and/or criminal penalties. Unauthorized uses of intellectual property and confidential information can also cause loss of revenue, remediation costs and damage to our reputation. Please be aware that you remain bound to maintain confidentiality even after the end of your employment at or cooperation with Yettel Bulgaria in accordance with applicable legal or contractual requirements. All products and contents that have been created while working for Yettel Bulgaria are the sole property of Yettel Bulgaria, subject to applicable legislation and relevant legal standards.

No products and contents may be reproduced in any form, downloaded by any other means or incorporated into any information retrieval system other than for official use, without Yettel Bulgaria's prior written permission.

Our Confidential Information

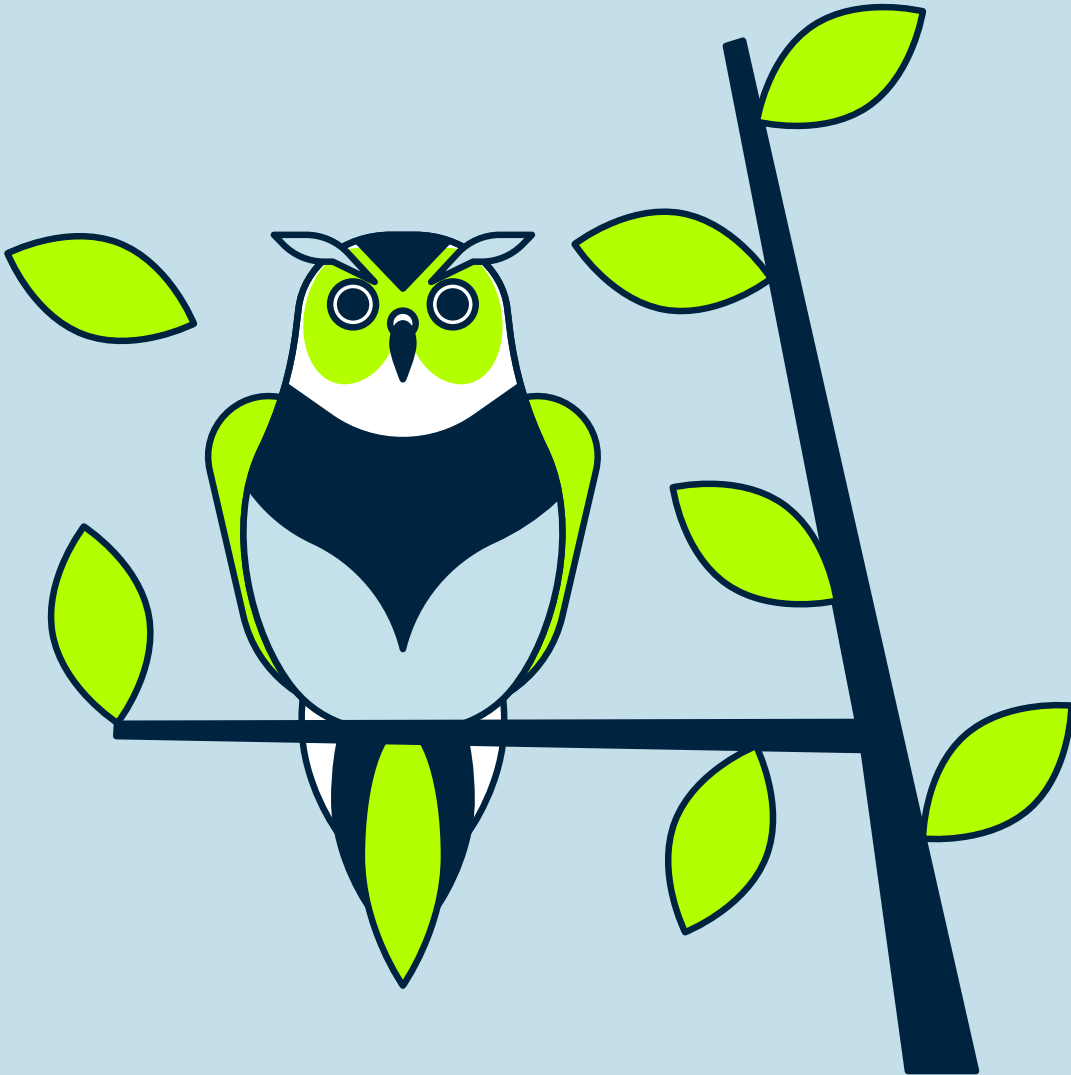
Confidential information shall be used only for Yettel Bulgaria's purposes and should not be disclosed to anyone outside the company. When sharing information internally, only do so on a strict need to know basis.

When sharing confidential information externally, you should protect such information by sharing it only with authorized parties in a secure way (e.g., under the terms of an approved agreement). Please exercise caution when discussing confidential information in public places where you may be overheard.

Please refer to the internal policies of Yettel Bulgaria for more details on how to treat confidential information and practices relating to security of our systems and the confidential information that is stored on them.

You must not input, upload, or share any personal, non-personal, copyrighted or confidential information into AI tools or platforms without prior authorisation, and ensure such information is processed in strict compliance with applicable regulations and policies, and protected from unauthorised access, collection, and misuse.

You should not share company emails to your personal private emails and (where technically possible) avoid the use of personal USB sticks or external hard drives to save or transfer company confidential information without obtaining appropriate approval, as per the internal policies and security requirements of Yettel Bulgaria.



You are expected to respect any confidentiality obligations applicable to you that relate to information under your control. Keep in mind that the use of any intellectual property or confidential information that belongs to Yettel Bulgaria might constitute a contractual breach and might lead to disciplinary or legal action.

You must immediately report the loss of any misplaced confidential information.

Yettel Bulgaria Assets

Our assets include everything that the company owns or uses to conduct business and serve our customers and society in the best way possible. Each of us is entrusted to apply due care and good judgement when using these assets. Be prudent when using Yettel Bulgaria's assets as you would use your own. Careless, inefficient, or illegal use of Yettel Bulgaria's assets is detrimental to the business.

Information technology assets

To protect our information technology assets, such as networks, computers, programs and data from attack, damage, theft or unauthorised access by others, make sure you follow the processes and applicable internal policies and security procedures that Yettel Bulgaria has in place.

Financial assets

To ensure accurate use of our financial assets, make sure all the expenditures are appropriately approved and accurately recorded in accordance with Yettel Bulgaria's processes and procedures.

Insider trading

As an employee of Yettel Bulgaria, you might be exposed to material and non-public price sensitive information that influence someone to buy, sell or hold securities of our shareholder(s) or third parties. Please keep in mind that the use of such information is prohibited and punishable by laws applicable in the countries in which Yettel Bulgaria operates and may subject you to disciplinary and personal legal action that may risk imprisonment and/or monetary fines. We each have a duty to protect inside information and comply with applicable internal policies in relation to insider information and/or trading.

Our responsibilities

We each have a duty to look after and respect all of Yettel Bulgaria's assets. We should protect them from misuse, theft and waste. You can do this by:

- **Always using Yettel Bulgaria resources responsibly and appropriately;**
- **Ensuring hardware, such as laptops, phones and1 other handheld devices, are never left in public or insecure places;**
- **Only using software that has been properly licensed and approved by the appropriate department for use. The copying or use of unlicensed or "pirated" software on Yettel Bulgaria's computers or other equipment is strictly prohibited;**
- **Reporting any suspicions you may have concerning theft, embezzlement or misappropriation of any Yettel Bulgaria property;**
- **Respecting and acknowledging the copyright and intellectual property of others, obtaining the appropriate consent or permission to use the intellectual property in our products, services and activities; and**
- **Ensuring business expenditure is accurately and honestly accounted for.**

Social Media

Please act responsibly when discussing current affairs and expressing your opinion on social media. Remember to always 'be yourself' and if you do express opinions, you should clearly mention that anything you state reflects your personal opinion and not those of Yettel Bulgaria.

In this digital age, the lines between public and private, personal and professional are often blurred in the usage of social networks. By virtue of identifying yourself as an employee of Yettel Bulgaria within a social network, you are connected to your colleagues, managers and even our clients. We should remember that whilst we all have freedom of speech that does not mean freedom from its consequences, including those relating to Yettel Bulgaria.

You should ensure that content associated with you is consistent with your work at Yettel Bulgaria - this includes pictures, followers, and posts - and also is consistent with local data privacy rules concerning information you intend to share about your colleagues,

managers and/or clients. If you identify yourself as an employee of Yettel Bulgaria and link back to a corporate X post, Facebook page, LinkedIn page, or other social network platform, ensure that your profile and related content is consistent with applicable laws (including data privacy) and with how you wish to present yourself with colleagues and clients.

You should not engage in any conduct that would not be acceptable in our workplace (e.g., use of racial or ethnic slurs, personal insults, obscenities, or similar language not acceptable at work) or which is in breach of this Code. You should not post anything on social media that is of a discriminatory nature or would constitute a threat, intimidation, or any other form of harassment or discrimination. Never discuss our business performance or other sensitive matters publicly in any online social platform, even if you are expressing your own opinion and using a disclaimer. You should not cite or reference clients, partners or suppliers without their and our written approval.



Complying with legal and regulatory rules and standards



Complying with legal and regulatory rules and standards

Doing what’s right is at the heart of how we work. We follow all applicable laws, rules and regulations, as well as Yettel Bulgaria’s p governing documents, and when there is a choice, we take the higher standard. We act independently and in the best interest of Yettel Bulgaria and its stakeholders. If something feels wrong, unclear, or does not align with our codes and policies, please reach out and ask for advice from Yettel Bulgaria Ethics and Compliance team, or your line manager.

Bribery & Corruption

We win new business and maintain our business relationships because of what we offer, not because of improper payments or favours. Acting with honesty and fairness is essential to maintaining trust with our customers, partners, and communities. Bribery and corruption damage reputations, distort fair competition, and can result in severe penalties for both individuals and Yettel Bulgaria. That is why Yettel Bulgaria strictly prohibits any form of bribery or corruption—whether giving, accepting, or requesting something of value to improperly influence a business decision.

We Do:

- **Conduct all dealings with fairness, transparency, and integrity**
- **Follow anti-bribery and anti-corruption rules and complete all required trainings**
- **Keep clear and accurate records of all payments and transactions**
- **Perform due diligence before engaging third parties or intermediaries**
- **Report any suspected bribery, corruption, or improper conduct immediately**
Refuse improper requests and seek guidance when in doubt

We Don’t

- **Offer, request, or accept cash, gifts, or anything of value to influence a business decision**
- **Make “facilitation payments” to speed up routine government or business processes**
- **Use intermediaries to engage in actions we are not allowed to take directly**
- **Ignore or overlook warning signs of bribery or corruption**
- **Retaliate against anyone who raises bribery or corruption concerns**

Certain external activities, such as charitable initiatives, community partnerships, or participation in industry groups, carry reputational and compliance responsibilities. Employees who lead, approve, or support these activities are expected to understand and apply the ethical standards outlined in internal policies. While all employees receive general ethics training, those involved in external or public-facing activities may be required to complete additional training related to third-party risk and reputational responsibility, as may be outlined in Yettel Bulgaria’s governing documents. External organisations that receive support, public recognition, or formal engagement from Yettel Bulgaria must be reviewed and approved in accordance with our governing documents to ensure legal compliance and consistency with Yettel Bulgaria’s values.

Know and follow the rules on gifts, entertainment, and hospitality

Gifts, entertainment and hospitality can support healthy business relationships when handled properly, but they must never influence or appear to influence our business decisions or actions. For the purposes of this Code, a gift represents anything that, regardless of its content and form, can usually be considered valuable, and which, without any doubt, is presented as a gift, i.e. without the expected corresponding counter-value.

All gifts, entertainment, and hospitality must have a clear business purpose, be reasonable and infrequent, and follow approval and reporting requirements. You should never ask for a gift nor offer or provide any gift to a person to influence their decision. Further, you should not accept any gift or favour if it might create a sense of obligation, or favouritism, or comprise your professional judgement or appear to do so.

In accordance with standard market practice in relation to our activities, we have established a threshold value of EUR 300 (or the equivalent in another currency) for the purpose of prior mandatory approval of gifts to be received by Yettel Bulgaria employees, or provided to outside persons outside Yettel Bulgaria. All gifts exceeding the abovementioned threshold of EUR 300 are subject of mandatory registration regarding their nature, the identity of the donor or recipient, as well as all circumstances that can be considered essential in connection with the gift (especially the reason and purpose of receiving/ giving the gift).

We Do:

- Record and seek approval before accepting or offering business courtesies, including via a gift and entertainment register, where the gift, event, hospitality or entertainment exceeds the 300 EUR threshold, or where it is intended for a public official (e.g. a member of state or local government, a judge or another person who holds a public office)
- Politely decline gifts, entertainment, or hospitality that are excessive or unrelated to business
- Check whether the person or company involved is in an active tender, negotiation, or approval process before accepting or giving anything
- Keep gifts, entertainment, or hospitality infrequent and proportionate to the relationship
- Ask for advice if unsure about the appropriateness of a gift or invitation

We Don't:

- Accept personal favours, discounts, or services that are not available to others
- Offer or receive travel, accommodation, or event tickets unless pre-approved and directly related to a business purpose
- Provide or accept gifts of money or monetary equivalent (including cash, vouchers or cryptocurrency)
- Provide or accept gifts, entertainment, or hospitality for family members or friends who are not part of the business relationship, unless pre-approved
- Ignore how an offer might look to others, even if you believe it won't affect your judgment
- Hide or fail to declare gifts, entertainment, or hospitality

For more information on providing and receiving gifts, entertainment and hospitality in an acceptable manner, please consult Yettel Bulgaria's applicable governing documents in relation to gifts, entertainment and hospitality. Third parties should refer to the Supplier Code of Conduct.

Avoid conflicts of interest to the greatest extent possible

A situation may occur where your personal interests are inconsistent or interfere in any way with the interests of Yettel Bulgaria and your duties/obligations as an employee.

There are a number of situations that might constitute a conflict of interest, and these situations are often unique. Yettel Bulgaria's governing documents will guide you on how to identify conflicts of interest and how to avoid them, or otherwise once existing, to disclose, mitigate and resolve them. Avoidance is key, so employees need to be vigilant of any actions or relationships that create or even has the appearance of creating, actual or potential conflicts of interest (involving either yourself or another employee). We have provided examples below to help navigate the potential for conflicts of interest.

Employees are required to regularly declare via the appropriate internal channels, any changes in their circumstances, either in the future or otherwise, which may result in actual or potential conflicts of interest. Failure to comply with Yettel Bulgaria's governing documents relating to conflicts of interests may result in disciplinary and legal action being taken wherever appropriate.

- We Do:

- **Make decisions based only on what's best for Yettel Bulgaria, free from personal influence**
 - **Step aside from decisions where our impartiality could be questioned**
 - **Update our disclosure whenever personal circumstances change**
 - **Follow controlling conditions to manage disclosed conflicts**
 - **Seek guidance whenever unsure if something might be a conflict**
- We Don't:

- **Use our position or influence to benefit ourselves, family, or friends**
 - **Take on outside work or roles that compete with or interfere with our responsibilities at Yettel Bulgaria**
 - **Use Yettel Bulgaria resources or confidential information for outside work or personal gain**
 - **Fail to disclose personal interests that could impact or appear to impact business decisions**
 - **Ignore how something might look to others, even if we believe it is harmless**

Following import, export, and trade compliance rules

For Yettel Bulgaria, it is essential to know and comply with the applicable sanctions laws and import, export and trade control laws that govern global trade of our goods, services and technical information. You need to understand and comply with the regulations and restrictions on dealings with certain countries, entities and individuals pursuant to the applicable national and international trade sanctions laws. Those include directives, regulations and other relevant acts of (among others) the European Union that are relevant to sanctions and inform our internal procedures relating to transactions, as have been transposed in our EU countries of operation.

Prevent money laundering

Money laundering is a process whereby individuals or entities attempt to conceal or disguise the true nature, source or location of illegal funds or make them appear legitimate.

We all need to ensure that Yettel Bulgaria does not facilitate such activities, and that involves the diligence and attentiveness of all employees. Therefore, everyone working for and with Yettel Bulgaria must take reasonable steps to determine the origin of funds he/she receives or procures and the identity of the ultimate beneficial owner of these funds to whom Yettel Bulgaria makes payments to or receives payments from, in accordance with the requirements set forth in applicable laws.

We must always keep accurate books and records. Be watchful for any payments that look irregular or for customers who appear to lack integrity in their operations. Most countries have laws prohibiting money laundering. These laws often place criminal liability on both the individual employee as well as the company by whom they are employed.

Data protection and data privacy

We are committed to safeguarding the right to privacy and the protection of personal data of our customers, employees, and business partners. Yettel Bulgaria complies with applicable data protection laws and is committed to being transparent about how it collects, processes and retains the personal data of its workforce and stakeholders (ensuring that personal data is processed in a fair and lawful manner), in order to meet its data protection obligations, including with Regulation (EU) 2016/679 (General Data Protection Regulation) (GDPR).

We handle personal data with due care, by implementing technical and organisational security measures to prevent accidental or unlawful destruction or disclosure of personal data and limiting the access of personal data to those who are appropriately authorised, in accordance with applicable laws and for legitimate business purposes only. We all have a role to play in protecting people's personal data.

Make sure you understand your legal obligations under the applicable data protection laws. Ask your Data Protection Officer (DPO) or the privacy team if you are unsure.

Our responsibilities:

- **Undertake data privacy and information security training, with the aim to have such training occur annually;**
- **Be accountable for protecting personal data and stay informed about our personal data related governing documents;**
- **Promptly report any actual or suspected unauthorized uses, disclosures or access to your manager, the DPO or a member the privacy team;**
- **Limit the collection and processing of personal data to legitimate business purposes in line with local laws and retain personal data only as long as needed and in accordance with Yettel Bulgaria's governing documents;**
- **Be transparent about our privacy practices and how individuals can contact Yettel Bulgaria with questions or concerns, or requests related to their data within our systems and assets; and**
- **Only share personal data with those who have a legitimate need to know and whose access is appropriately authorized.**

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Responsible AI Development, Deployment and Use



Responsible AI Development, Deployment and Use

At Yettel Bulgaria, we embrace new technologies to improve our efficiency and enrich our customers' and employees' lives. We recognize the powerful opportunities created by Artificial Intelligence (AI), but we also acknowledge that AI must be developed, deployed, and used in a manner that is responsible, ethical, and aligned with our core values and legal obligations.

Accountability

We are accountable for the AI systems we procure, build, and use. AI systems and tools are intended to augment, and not replace, human judgment and professional responsibility. We ensure that our AI activities are consistent with human rights and democratic values.

Yettel Bulgaria is committed to ensure that:

- **Employees remain accountable for the final outcome of their work, even when assisted by AI. All AI-generated output must be critically reviewed for accuracy, quality, and appropriateness before use.**
- **The development, procurement, and deployment of any AI system must have clearly defined ownership, ensuring accountability throughout the system's entire lifecycle, from design to decommissioning.**
- **We adhere to all applicable laws and regulations governing AI, including the EU AI Act. Breaches of this Code or related AI governing documents may result in disciplinary action.**

Fairness and Non-Discrimination

We are committed to ensuring our AI systems are fair and equitable. AI must not create or perpetuate unfair bias against individuals or groups based on age, race, gender, ethnicity, disability, or any other protected characteristic.

All employees involved in the development, procurement, deployment and/or use of AI are responsible to ensure that we are proactive in identifying and mitigating bias. Data used to train AI models and all systems supporting decisions that impact individuals or groups of individuals must be rigorously assessed for potential sources of bias before and during their deployment.

Transparency and Explainability

We are committed to being open with our use of AI. It should be clear to our employees, customers, and other stakeholders when and how AI is being used, and the outcomes should be as understandable as possible. Therefore, employees must be transparent when content, analysis, decisions, or communications have been materially generated, altered or affected by AI, to ensure that our customers, colleagues or other stakeholders are not misled.

When deploying AI systems that recommend or make decisions about individuals or groups of individuals, we will be transparent about their use and provide clear explanations for the outcomes in a clear and accessible manner.

Robustness, Security, and Privacy

AI systems that we develop, procure or deploy must be secure, reliable, and respectful of data privacy. The protection of all corporate, customer, and personal data is paramount and must be embedded by design into any AI-driven process.

All employees must handle company and personal information with the utmost care, strictly adhering to Yettel Bulgaria's governing documents on data classification, information security, and acceptable use.

AI systems must be resilient against vulnerabilities and able to perform reliably and accurately, in accordance with their intended use.

Human Oversight and Agency

We at Yettel Bulgaria aim to ensure that our AI systems are subject to meaningful human oversight to prevent unintended or harmful outcomes. It is our unwavering belief that technology must remain in service of human decision-making, not the other way around.

For any AI system with a significant ethical or legal impact, a human must retain the ultimate authority to review and as needed, to override the decisions or outputs of the AI system.

Environmental and Societal Well-being

We recognize our responsibility to ensure that our use of AI contributes positively to society and a sustainable environment. We encourage the use of AI to create innovative solutions that address societal challenges and support our commitment to corporate social responsibility.

Our use of AI must support inclusive growth and well-being. Therefore, when developing, procuring or deploying AI systems, employees of Yettel Bulgaria must always consider their potential environmental impact, including energy consumption and resource utilization.

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Doing Good is Good Business



Doing good is good business

Doing good is good business means operating as responsible global citizens, while conducting business with integrity, accountability, and transparency. By improving the lives of our colleagues, customers, communities, and the environment where we operate, we create sustainable value that benefits society and strengthens our company.

Yettel Bulgaria’s dealings with our supply chain

Yettel Bulgaria is committed to doing business responsibly with the highest standards of ethics and integrity. We expect that our partners, suppliers, consultants, contractors, agents, and third parties to apply the same standards. To protect our reputation and ensure alignment with our values, we carry out thorough registration, due diligence, and engagement processes before working with any third party. We do this to responsibly manage the wider impact our business has on communities, society, and the environment.

We have a Supplier Code of Conduct in place, which is available on our website, which set out the responsibilities of our suppliers and obligations towards ethical procurement and doing good. All of our suppliers are encouraged to ensure their own suppliers and subcontractors are made aware of the principles of the Supplier Code of Conduct when undertaking any work, or providing any product or service to, or on behalf of Yettel Bulgaria.

If you suspect that a supplier has breached the principles and standards set out in the Supplier Code of Conduct, you should contact the Sourcing team or alternatively use the Speaking Up process to escalate your concerns.

Yettel Bulgaria respects human rights

We understand that while governments and national authorities have a duty to protect the human rights of their citizens, doing good is good business also means respecting the fundamental rights of every individual touched by our operations. We are committed to ensuring that all workers in our supply chain receive fair and equal treatment, in compliance with the applicable laws and regulations.

We align our approach throughout our business operations with internationally recognised frameworks, including the EU Charter of Fundamental Rights, the International Bill of Human Rights and the principles concerning fundamental rights set out in the United Nations Guiding Principles on Business and Human Rights, together with human rights principles that exist in Bulgarian and EU legislation.

We strive to ensure that we are not complicit in human rights abuses and seek ways to honour the principles of internationally recognised human rights. Yettel Bulgaria does not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labour), physical punishment, forced or prison labour or human trafficking.

We strongly prohibit the use of any form of forced, bonded, compulsory labour, physical punishments, slavery, or human trafficking in any part of our supply chain. If you suspect a breach of our principles on human rights, you should contact the Sourcing team or alternatively use the Speaking Up process described below to escalate your concerns.

Yettel Bulgaria and the environment

Everyone who is working for and with Yettel Bulgaria is expected to integrate environmental considerations in their day-to-day operations and strive for continuous improvement, by minimising any adverse effects of their operations on the environment.

We commit to protecting the environment and minimising the use of finite resources (such as energy, water, and raw materials) and the release of harmful emissions to the environment (including waste, air emissions and discharges to water). We comply with relevant national and international legislation and standards and set global policies.

We work with customers, suppliers, and contractors to develop products and services to minimise the impact we have on the environment and maintain stakeholder confidence by being open and responsive to the concerns of customers, regulators and the local communities in which we operate.

You can do your part to support our commitments to the environment by:

- Reducing waste, energy, and emissions to air and water.
- Handling chemicals in an environmentally safe way.
- Handling, storing, and disposing of waste in an environmentally safe manner.
- Contributing to the recycling and reuse of materials and products.
- Avoiding unnecessary travel to reduce your carbon emissions by using videoconferencing where possible.



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Ethical Decision Making



Ethical Decision Making

Our Code provides you with an overview of the legal, regulatory, and ethical rules and standards essential to achieve the Yettel Bulgaria's objectives and uphold our values. Our governing documents set out and particularize these requirements and standards in a manner consistent with the Code.

Our Code is not a substitute for your good judgement; it is not designed to cover every possible scenario you may encounter. It is down to you to put these values and behaviours into action.

When faced with tough choices or grey areas, to help you or your team decide if you're making the right decision, you should ask yourself the following questions:

- **Is this legal and ethical?**
- **Is this in line with our Code of Conduct and the applicable governing documents?**
- **Is this right for our customers and the community?**
- **Am I treating others the way I would want them to treat me?**
- **Would I be proud to tell other about my actions or inactions?**
- **Would I feel comfortable if my actions or inactions were made public in the media?**

If you answer 'no' to any of these questions, or if it is still unclear what to do, please ask for advice from your local Ethics and Compliance team (you may reach out to compliance@yettel.bg), or consult the respective section of the Code or the relevant governing documents.

Remember you should take action once you have made a decision. If you see an issue or something that isn't right – don't stand by, and if you are unsure what to do, please ask for advice.

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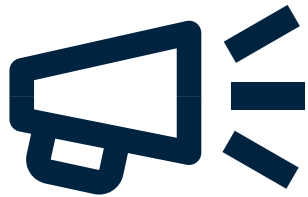


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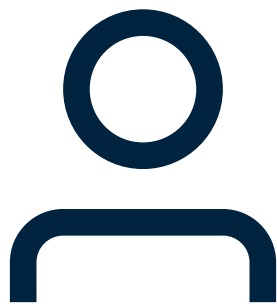
At Yettel Bulgaria, we are committed to the highest possible standards of openness and accountability. If you suspect anything illegal or unethical, we expect from you and encourage you to immediately report your suspicions, because any deviations from or violations of the Code are not accepted by Yettel Bulgaria. We take reports of wrongdoing very seriously.

We have implemented an internal reporting channel for whistleblowing complaints, in line with the Bulgarian Act on the protection of persons who report information or publicly disclose information on breaches (Whistleblower Protection Act) which implements Directive (EU) 2019/1937 (Whistleblowing Directive). The internal reporting channel also applies to signals that relate to matters that do not fall within the scope of the aforementioned Whistleblower Protection Act and EU directive.

There are a number of ways Speaking Up to raise your concerns at the Yettel Bulgaria:



- Speak to your line manager as your first point of contact - we encourage you to consult with your line manager on any issue first (unless it is not appropriate to do so due to the nature of the matter)



- Speak with Ethics and Compliance team on any questions you may have regarding the application of our Code of Conduct.



- If you are not sure how a particular section of our Code relates to any issue you may be experiencing, please reach out to compliance@yettel.bg.



- You may raise a concern in confidence via multiple whistleblowing channels, including - please refer to Yettel Bulgaria's Local Whistleblowing Manual which is available on our official corporate SharePoint site.

- Additionally, you may refer any concerns on an anonymous basis via the official e& PPF Group whistleblower module, available [here](#), to the e& PPF Group Ethics and Compliance Department at whistleblower@eandppftelecom.eu, or by phone to the e& PPF Group Chief Legal & Regulatory Officer at +420 725 491 303. Please also refer to e& PPF Group's Whistleblowing Policy for details concerning the making of any whistleblowing claims, available [here](#).

All reports will be kept confidential to the extent practical, except where disclosure is required by applicable law or court order. For more information, kindly refer to the whistleblowing governing documents of Yettel Bulgaria. We appreciate those who speak up. Asking a question or reporting a suspicion shows that you are trying to do the right thing.

Remember that you have the right to remain anonymous, so your identity does not need to be revealed. Should you wish to disclose your name however, and subsequently experience any form of retaliation or harassment, Yettel Bulgaria will investigate and take appropriate action.

Zero Tolerance for Retaliation

You should feel free to report any suspected violation of the law, governing documents or this Code without fear of retaliation or any negative impact on your relationship with Yettel Bulgaria. Retaliation in any form, in response to a report for raising a concern, filing a report or cooperating in an investigation is completely unacceptable and undermines the purpose of our Code of Conduct. Anyone who, in good faith, raises a question or files a report about a suspected violation or non-compliance of our Code shall be protected against any acts of retaliation even if the issue or report is ultimately unsubstantiated, in line with Yettel Bulgaria's Local Whistleblowing Manual. Retaliation against anyone who, in good faith, participates in any investigation likewise is prohibited. If you believe you have suffered retaliation or reprisal, report the matter to Yettel Bulgaria's Ethics and Compliance team, or utilise any of the whistleblowing reporting channels as described above.

False or malicious allegations

An individual that uses Yettel Bulgaria's internal policies and the procedures in our Code to make deliberately false and/or malicious allegations about a colleague or manager, or as a form of bullying against a colleague or manager will be subject to disciplinary action that could result in termination of employment.

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How am I expected to use our Code of Conduct

We expect you to behave in an ethical manner in your actions and decisions. This means complying with the principles and rules in our Code of Conduct and fulfilling your legal and regulatory obligations. Take the time to understand our values and use the principles set out in our Code in your day-to-day work. Let someone know if you feel a working practice is not ethical or safe or if it breaches our Code by Speaking Up.

What is the Whistleblower Hotline?

If you feel uncomfortable speaking to your line manager or someone else at work about any issue or concern, you can also report issues, concerns, or behaviour that you believe is not in line with our Code of Conduct or established standards of behaviour via multiple whistleblowing channels. We encourage you to refer to Yettel Bulgaria's Local Whistleblowing Manual located on our corporate SharePoint site.

Additionally, you may refer any concerns on an anonymous basis via the official e& PPF Group whistleblower module, available [here](#), to the e& PPF Group Ethics and Compliance Department at whistleblower@eandppftelecom.eu, or by phone to the e& PPF Group Chief Legal & Regulatory Officer at +420 725 491 303.

Where can I find all the policies referred to in our Code of Conduct?

All governing documents and further information can be found on the internal networks and sharepoint sites of Yettel Bulgaria. If you cannot locate the one you are looking for, please reach out to our Ethics and Compliance team at compliance@yettel.bg, or speak to your line manager who will guide you or provide you with a copy.

If I make a whistleblower report in confidence or otherwise report it anonymously, will I get into trouble?

You can make any complaints in confidence or submit them anonymously without facing any consequences, however you should remember if you do not leave your name, it may hinder the ability to effectively conduct an investigation and ask you for follow up information. We encourage you to leave your name if it will help resolve the issue and we assure you that your concerns will be handled confidentially and dealt with in a fair and balanced way.