

Local Policy

Responsible Marketing

	Position	Name	Signature
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1. Purpose & Scope of Application

The Responsible Marketing Policy defines Yettel Bulgaria's commitment to ethical, transparent, and customer-centric marketing, advertising and public relations (PR) practices. This policy ensures that all marketing, advertising, public relations, and corporate communications align with the company's values, legal requirements, and sustainability goals, fostering trust and promoting responsible business conduct.

This policy applies to all advertising, marketing, public relations, corporate communications, and promotional activities undertaken by Yettel Bulgaria, including:

- Advertising and digital marketing (social media, online campaigns, TV, print, and radio)
- External and internal events (sponsorships, industry conferences, internal staff events, and customer engagements)
- Native media content and press activities (interviews, articles, sponsored content, and PR stories)
- C-level participation in business events and forums
- Employer branding and corporate reputation initiatives
- It governs interactions with customers, partners, media, and the public across all platforms and media.

2. Definitions

Responsible Marketing and PR

The practice of ensuring that all marketing, advertising, and public relations (PR) activities are ethical, transparent, customer-centric, and aligned with sustainability principles. This includes truthful advertising, responsible storytelling, ethical data use, and sustainability-focused event management.

Truthful Marketing

Ensuring that all marketing messages, promotions, and campaigns provide accurate, clear, and non-misleading information to consumers. This includes pricing, product claims, and service benefits that reflect reality.

Transparent PR and Communications

A commitment to honest, fact-based, and accountable communication across media relations, native advertising, event sponsorships, and corporate messaging. Transparency requires clear disclosure of sponsored content, advertorials, and financial interests in media engagements.

Inclusive Representation in Marketing and PR

Ensuring that all advertising, PR, and corporate communications reflect diversity, equity, and inclusion (DEI) principles, avoiding stereotypes, exclusionary narratives, or misleading representations.

Stakeholder Engagement in Responsible Marketing and PR

The practice of regularly consulting with consumers, media, advocacy groups, and business partners to align marketing and PR strategies with societal expectations and ethical standards.



3. Relevant Standards and Requirements

This policy adheres to:

- European Sustainability Reporting Standards (ESRS): ESRS S4 (Consumers and End-Users) and ESRS G1 (Business Conduct);
- The United Nations Sustainable Development Goals (SDGs);
- Bulgarian Advertising Law and industry regulations;
- Journalistic and media ethics codes;
- European Accessibility Act;
- Yettel Bulgaria's Sustainability Strategy 2028.

4. Roles and Responsibilities

Policy Owner: The Chief Commercial Officer (CCO) ensures the implementation and periodic review of this policy.

Marketing and Corporate Communication Teams: Responsible for creating and approving marketing and PR content in compliance with this policy. Ensure transparent, ethical, and accurate representation of Yettel Bulgaria in public communications, events, and media interactions.

Legal Team: Monitors adherence to legal and ethical standards in marketing practices.

5. Principles, Rules, and Other Requirements

5.1 Ethical Marketing Practices

Ensure all marketing, PR, and corporate communications are truthful, clear, and not misleading.

Avoid exaggeration, manipulative language, or deceptive storytelling in media placements, interviews, and promotional content.

Do not exploit vulnerable audiences, including children and financially distressed individuals.

Ensure diversity and inclusivity in advertising, PR messaging, and corporate engagements.

Maintain editorial independence when working with journalists and avoid influencing media coverage through non-transparent means.

No promotion of technology addiction, especially among children. Marketing campaigns must emphasize healthy and responsible use of digital technology.

5.2 Transparency

Clearly disclose terms, conditions, pricing, and advertorial content in a way that is understandable to consumers.

Explicitly identify paid or sponsored media placements, including native articles, influencer collaborations, and event sponsorships.

Ensure transparency in interviews and public statements made by Yettel Bulgaria's representatives.



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Clearly disclose terms and conditions, pricing, and any applicable fees, ensuring they are written in plain language and accessible formats for diverse audiences.

Marketing texts must be inclusive and accessible, where applicable and possible. Key information should be presented clearly, in readable text, and not only as images or graphics to ensure accessibility.

5.3 Consumer Data Protection

Use consumer data responsibly and in compliance with data protection laws, including GDPR, through measures such as data encryption, regular audits, and restricted access protocols.

Provide consumers with clear options to manage their data preferences.

5.4 Environmental Responsibility

Promote conscious use of technology. Marketing and PR materials should encourage sustainable digital habits (e.g., device recycling, energy-efficient usage, and eco-friendly digital solutions).

Minimize the environmental impact of marketing materials by using digital-first strategies and eco-friendly resources.

5.5 Responsible PR and Stakeholder Engagement

Ensure C-level participation in business forums aligns with company values, avoiding engagements that conflict with ethical business practices.

Encourage dialogue with stakeholders (customers, regulators, media, and business communities) to ensure alignment with societal expectations.

5.6 Accessible communication

Assure communication created by Yettel is accessible for all customers and interested parties. This is to be achieved by following international practices and ensuring that all the information provided in the Yettel communication channels follows the guidance of the European Accessibility Act.

6. Implementation of the Policy

Yettel Bulgaria ensures responsible marketing through:

- A structured **review process** for all marketing and public-facing materials to ensure compliance with ethical and legal standards.
- **PR & Media Oversight:** Establishing a corporate communication review process for press materials, interviews, and media engagements.
- **Event Compliance:** Ensuring all external and internal events align with responsible communication principles.
- **Training:** Providing regular training to marketing and communications teams on responsible practices.
- **Feedback Mechanisms:** Creating channels for customers to provide feedback or raise concerns about marketing practices, such as surveys, customer support hotlines, and digital feedback forms.



7. Policy Strategy and Objectives

Key objectives include:

- Building trust through honest and transparent advertising, marketing and corporate communications;
- Encouraging responsible media storytelling in interviews, articles, and industry participation;
- Encouraging sustainable consumption by highlighting eco-friendly products, practices and services;
- Fostering accountability in public engagements, ensuring C-level participation aligns with responsible business principles.

8. Related Measurable Targets and KPIs

- Percentage of marketing campaigns reviewed for compliance;
- Number of sustainable products or services promoted annually;
- Decrease year over year in quantities of produced marketing materials for promotional purposes such as leaflets, catalogues, brochures, posters, etc.
- Number of people reached on the topic of sustainable living.

9. Reporting and Disclosure

Publish annual updates on responsible marketing and PR practices in Yettel's Sustainability Report.

Include metrics related to responsible marketing in compliance with ESRS standards.

10. Training and Awareness

Conduct annual training for marketing, PR, and corporate communications teams, as well as external communication agencies Yettel works with, on ethical storytelling, diversity, and sustainability.

Provide resources to help teams understand and apply responsible marketing and PR practices.

11. Policy Review and Update

This policy is publicly available on Yettel's website, as well as made available to all employees through the Intranet webpage.

The policy will be reviewed annually or as needed to incorporate changes in regulatory requirements, industry standards, or company objectives. Updates will be documented in the change log.

12. Reference Documents

- Yettel Bulgaria Sustainability Report 2022 and onwards
- CSRD Delegated Act



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- Bulgarian Advertising Standards
- Local Policy Diversity, Equity and Inclusion

13.Change Log

Ver no	Revision category (new requirement, update, wording)	Placement (chapter)	Description of main revisions	Date
1	New Policy	all	Creation and Approval	16.06.2025