

CODE OF ETHICS OF LTA CONSULTING OOD

Art. 1. (1) The employee of the Company maintains the highest level of conduct in the society in accordance with the law, the principles of morality, the professional ethics for the relevant position and the professional practices established by the Company.

(2) The highest level of conduct consists in the personal engagement of the employee to be honest, honourable, loyal and to treat with the necessary respect his colleagues, the Company's clients and any other member of the society.

(3) The employee contributes to the Company's effective cooperation with the state authorities and the local self-government and administration.

Art. 2. The employee protects the prestige and the good name of the Company.

Art. 3. The employee contributes to the development of the work relations and the improvement of the work environment in the Company, including by giving professional assistance to his colleagues in the completion of their professional tasks.

Art. 4. (1) The Company allows no restrictions of the rights or privileges of the employees on the grounds of race, nationality, ethnic affiliation, sex, origin, religion, education, convictions, political affiliation, personal and social status or property status.

(2) The employee does not hinder and does not disturb the normal performance of the professional tasks and functions of his colleagues, as he also respects their personal rights and freedoms.

Art. 5. The employee does not abuse the rights which he has acquired in this capacity, including the right to paid or unpaid holidays.

Art. 6. The employee protects the Company's property and uses it for its intended purpose, to the extent necessary for the performance of his professional tasks and functions.

Art. 7. The employee observes the occupational safety and health rules.

Art. 8. The employee performs his professional tasks and functions responsibly and correctly.

Art. 9. When performing his professional tasks and functions, the employee conforms his appearance and clothing to the requirements for the prestige of his profession.

Art. 10. The employee develops his professional skills and qualification by personal preparation and educational activities, organized by the Company.

Art. 11. (1) The employee uses the information, received in relation to the work performed by him, solely for purposes directly related to his professional tasks and functions.

(2) The employee does not disclose the information under subart. 1 to persons outside the Company, as well as to other employees unrelated to it, unless otherwise assigned by his direct superior.

Art. 12. (1) The employee does not enter into professional relations with persons, with whom he has marital, family, friend or any other close relation, when due to his relatedness to the person he would not protect the Company's interests in the best possible way.

(2) If a conflict of interest under subart. 1 is found, the employee immediately notifies his direct superior.

Art. 13. (1) The employee does not accept material benefits of significant value in relation to the professional tasks and functions performed by him, outside the expressly settled remuneration for the relevant work.

(2) In case a material benefit under subart. 1 is offered to the employee, he immediately notifies his direct superior.

Art. 14. (1) In his work the employee is always guided by the interests of the clients, in accordance with the internal rules of the Company and the national and international legislation.

(2) The employee does not treat the clients differently on the grounds of their race, nationality, ethnic affiliation, sex, origin, religion, education, convictions, political affiliation, personal and social status or property status.

(3) In his work with the client the employee observes the principles of loyalty, confidentiality, coordination, predictability.

Art. 15. The employee expresses his opinion and makes suggestions on the organization and the performance of the Company's activities.

Art. 16. When participating on its own initiative in civil or political acts and/or media events, the employee does not engage the Company, as he specifies that he is acting in his individual capacity.

Art. 17. (1) In case of breach of the provisions of the present Code of Ethics or doubts over such breach, the employee immediately notifies his direct superior.

(2) For a breach committed by the direct superior of the employee, the latter immediately notifies the competent governing body of the Company.

Art. 18. (1) The provisions of the present Code of Ethics are construed in relation to the contracts, concluded between the employees and the Company, and the provisions of the Bulgarian legislation.

(2) The provisions of the Bulgarian legislation apply on the issues not covered by the present Code of Ethics.

Additional provisions

§ 1. Within the meaning of this Code of Ethics:

1. “*The Company*” is LTA Consulting OOD, entered in the Commercial Register with the Registry Agency with UIC: 203845699, with seat and registered office: Sofia 1532, Pancharevo reg., Kazichane distr., 124 Tzar Boris III str.

2. “*Employee*” is any person, performing activities from LTA Consulting OOD’s scope of activities under a civil or employment contract concluded with the Company.

3. “*Colleague*” is any other person than the concrete employee, performing activities from LTA Consulting OOD’s scope of activities under a civil or employment contract concluded with the Company.

4. “*The Company’s property*” is any movable item or real estate which is owned by the Company or which the latter uses under a rental, lease, loan agreement or on any other legal grounds.

5. “*Material benefit*” is any object, sum of money or service, which has led to the enrichment of its receiver.

6. “*On its own initiative*” means without being expressly assigned by the Company.

7. “*Media events*” are all public events, broadcasted by or reflected in the means of mass communication.