



CODE OF ETHICS

I. General Provisions

This code establishes moral-ethical norms, principles, and standards of conduct for employees of "BULMARKET GROUP" EAD and "ASTRA FINANCE" EAD as a foundation for the well-being of the company and each employee.

The purpose of the Code of Ethics is to cultivate high ethical standards in business, recognize the importance of every useful labor, and encourage each employee to protect their name, the name of their profession, and the name of "BULMARKET GROUP" EAD and "ASTRA FINANCE" EAD.

The Code of Ethics represents a system of moral-ethical norms and rules that all employees, including temporarily hired staff, voluntarily commit to observe and implement.

II. Rules of Conduct

General Rules of Conduct

When performing their official duties, employees of the company must adhere to the following rules of conduct:

1. Unconditional observance and respect for the rule of law, protection of indivisible and universal values – human dignity, freedom, equality, and solidarity.
2. Actions contrary to legal provisions or good commercial practices are unacceptable, regardless of the reasons justifying them. Good intentions do not justify illegal actions.
3. Employees must avoid any action that could potentially harm the good name of "BULMARKET GROUP" EAD and "ASTRA FINANCE" EAD.
4. Adherence to legal provisions is the foundation of ethical business

behavior. While employees are not expected to be familiar with all current laws in detail, they must be aware of the main rules affecting their area of activity and seek the help of the company's legal advisor in case of doubt.

5. Contractual agreements are considered fully binding. It is unacceptable to use power over a subcontractor or supplier to avoid fulfilling a contract condition or to perform an action not part of the subcontractor's or supplier's contractual obligations.

Internal Company Behavior

1. In their relations, employees of "BULMARKET GROUP" EAD and "ASTRA FINANCE" EAD are guided solely by the company's interests. They apply established rules for positive attitude, correctness, and respect for the honor and dignity of others.
2. In their communication with each other, employees are equal. Their relationships are based on trust, tolerance, ethics, and mutual assistance.
3. Professional and personal disagreements are not subject to public debate at the workplace or outside it.
4. Behavior that undermines the personal dignity and honor of any employee is not allowed.
5. Employees of "BULMARKET GROUP" EAD and "ASTRA FINANCE" EAD:
 - Respect the hierarchy in their official relations;
 - Strive for objectivity and impartiality in decision-making;
 - Take responsibility for their actions;
 - Encourage feedback in all activities and at all workplaces. They seek and accept opinions and views from others. They actively participate in solving problems within the company;
 - Promote free communication between management and employees.

They create and maintain collegial relationships within teams;

- Do not use their official position in the company to gain any advantage or benefit for themselves or their relatives;
- Strive for organization in their thoughts and actions. Filing unjustified complaints and spreading defamatory statements about company employees is unethical. Their public statements aim for objectivity and truth.

Personal Behavior

When performing their official duties and in their public life, employees of "BULMARKET GROUP" EAD and "ASTRA FINANCE" EAD follow behavior that does not harm the company's prestige, such as:

1. Correctly fulfilling their duties and commitments to the company.
2. Developing themselves and the people around them, identifying what is important, decisive, and inappropriate in this process. They do not threaten or violate the rights of colleagues and business partners.
3. Condemning all forms of direct and indirect discrimination, including racial, gender, religious, age-based, and those based on sexual orientation.
4. They may not receive personal benefits (apart from company remuneration) from activities or services undertaken on behalf of and at the expense of the company. They may not accept monetary amounts or gifts, except in cases where these gifts are promotional materials.
5. Being honest in their relations with partners and competitors.
6. Using internal company information only when performing work related to "BULMARKET GROUP" EAD and "ASTRA FINANCE" EAD. They protect the company's and its partners' intellectual property. Their relationships guarantee the confidentiality of our business and that of our partners.

Relationships with Business Partners

1. This code ensures the implementation of a transparent and open policy in the activities of "BULMARKET GROUP" EAD and "ASTRA FINANCE" EAD.
2. Competition is protected and encouraged, building trust among shareholders, business partners, and the public.
3. The fight against all forms of corruption and personal enrichment is promoted.
4. Company employees participate in and conduct negotiations with business partners politely, following generally accepted principles and norms of correctness, showing due respect to their partners without displaying unacceptable aggression. They are positive in their actions and relationships.
5. "BULMARKET GROUP" EAD and "ASTRA FINANCE" EAD expect and require their employees to act honestly and ethically in their official contacts. Our company's morality is: neither to accept nor to give gifts, nor to respond to invitations for lunches, dinners, or visits that would place either party or both in a position of obligation, except for commonly accepted official ones. The direct supervisor must be informed in advance of any contacts or cases that differ from the commonly accepted official ones or immediately after they occur.

III. Management's Commitment

1. The management commits to applying to the highest degree and competently organizing the application of these shared company-wide values in conditions of transparency, dialogue, and free exchange of opinions, ideas, and suggestions, and in accordance with the requirements for a good worker, specialist, and manager in "BULMARKET GROUP" EAD and "ASTRA FINANCE" EAD.
2. Takes all necessary actions to ensure the highest standards of quality, safety and health at work, environmental protection, human capital

development, and transparent cooperation with all stakeholders inside and outside the company.

3. Observes the principle of transparency and disclosure of undertaken commitments as a component of ISO standards for quality management systems, environment, and occupational health and safety.
4. Recognizes the responsibility to ensure that employees feel respected, honoring their personal dignity, encouraging their strengths, and creating a sense of security in the workplace.
5. Provides equal opportunities for professional realization, expression, and development for all employees, objectively and fairly evaluating the achieved results.
6. Develops leadership qualities. Leadership is about learning how to motivate, influence, and direct others.
7. Encourages personal initiative, develops individuality, and works to increase staff motivation, including through fair and adequate remuneration.
8. Promotes a sense of collegial respect, trust, and correctness towards the company, without tolerating actions that contradict shared policy and values.
9. Shows zero tolerance towards all forms of irresponsibility, duplicity, envy, gossip, lies, laziness, negligence, meanness, and sycophancy.
10. Guarantees the protection of personal data and any confidential personal information about employees that becomes known during or in connection with the performance of official duties, without allowing infringement of personal privacy.
11. Guarantees compliance with all human rights and freedoms of the individual during or in connection with the performance of official duties.
12. Leads a policy of open communication aimed at future improvement and

development of the present code, company-wide policy, and culture.

IV. Additional Provisions

Employees of the company are obliged to comply with the provisions of this code and, in connection with this, to be informed by the management of amendments and changes to its provisions.

The norms of this code are applied as long as they do not contradict the Labor Code and other applicable legislation.

The Code of Ethics is created and approved by the Company's Management, as should all future amendments to it. Every staff member and newly hired employee must be familiar with it. It must be published and appropriately presented on the website: www.bulmarket.bg.

Complaints from consumers, reports of corruption, or non-compliance with the Code of Ethics should be submitted to the email address office@bulmarket.bg or phone number +359(082) 817 466.

Confidentiality is guaranteed!