

**CODE OF ETHICS
EMPLOYEES OF THE
"AGENCY FOR CONTROL OF OUTSTANDING DEBTS" EOOD,
UIC 202527341**

**with registered office and address of management:
G. Sofia city, Oborishte district, 29 Panayot Volov Str., et. 3**

/approved on 07. 08.2020 years by the General Manager of the Company/

I. GENERAL

1. Introduction

As a leading financial institution in the field of debt collection in the Republic of Bulgaria, „**AGENCY FOR CONTROL OF OUTSTANDING DEBTS**“ **EOOD. (ACOD/Company)** works within the framework of clearly defined principles and ethical norms for achieving the set goals, as a result it has acquired and strives to maintain a good reputation among its partners and clients and in the public domain. Having regard to national and international legislation, this Code of Ethics (the Code) describes the principles and basic ethical norms with which the internal rules and policies of the **ACOD** comply, according to which employees and management exercise their obligations and contribute to the achievement of the company's business objectives. The principles described in the Code aim to ensure corporate governance standards by attaching importance to the values of integrity, impartiality, entrepreneurship, effectiveness, professionalism, transparency, social responsibility and environmental responsibility, respect for human rights and dignity, quick and positive response, teamwork and a sense of responsibility for compliance. The principles in this **Code** have direct and binding effect, and also serve to interpret or fill in gaps in the existing internal regulations of the **ACOD/Company**.

The Code is a binding document and is in force for the leadership of the **ACOD**, all employees, as well as independent assistants and consultants. **The Code** was created by **the ACOD/Company** following the company's general policy. It has been developed and implemented together with good international standards and corporate practices, as well as the existing regulatory and legal obligations of the **ACOD**.

2. Purpose of the Code of Ethics

This **Code** of Ethics aims to provide basic guidelines for ethical conduct for **ACOD** staff and to present the fundamental professional values and principles that they must respect in their work. In addition, it aims to support the growing validation of the good name and reputation of **the Company** and to increase the trust of clients and partners in society for the professionalism and morale of its employees.

The basic rules of employment of employees should be addressed to:

- all respect the principles of legality, loyalty, honesty, impartiality, accountability and accountability;
- we all carry out our activities competently, objectively and in good faith;
- we all strive to continuously improve our work in the interest of the clients and partners of **the Company**;
- all respect the rights and merits of the individual and not to allow any discrimination;
- all declare that ethical behavior is the hallmark of professionalism.

3. OBJECTIVE, MISSION AND VALUES OF THE ACOD

1. **The purpose** of the company is to merge all activities allowed by the Bulgarian legislation related to the collection of receivables by physical and legal persons with different periods of arrears.
2. **The mission** of the company is oriented in the direction of observance of moral and ethical norms in the implementation of the negotiating and conclusion of agreements with financially difficult and temporary insolvent clients of our partners.
3. **The values that's** we profess:
 - Respect for personality;
 - Giving debtors a chance to rehabilitate and return them to the financial products market;
 - Respect for the market;
 - Focus and empathy for society's problems;

II. PROFESSIONAL VALUES

The employees of the **ACOD** are guided by the professional values, which are of the utmost importance for increasing the prestige and affirmation of **the Company** as a market leader in the field of debt collection.

- **Competence**

We apply specific knowledge and experience. We show professionalism, objectivity and activity in developing and conducting the company policy, in the implementation of our powers and implementation of the decisions taken by the management of **the Company**.

- **Independence**

We work openly, honestly and fairly. We work to the highest standards for the industry in the field of debt collection. We provide independent advice and are responsible for our actions. None of us are not obliged to comply with an unlawful order

when it contains an obvious violation for us. We do not allow ourselves to be placed financially or in any other affiliation by outsiders or organizations, or to request or accept gifts or cash, services, benefits or other benefits that may affect the performance of our duties, our decisions or violate our professional approach to certain matters.

- **Correctness**

Our clients and our employer's partners expect our work to be performed qualitatively and on time. We represent our clients strictly by complying with the law, protecting the good name and reputation of our customers. We value truth and accuracy towards customers and the employer. In the performance of our duties, we protect our entrusted property and do not allow its use for personal or foreign purposes, if we are expressly not permitted by the relevant management level. We are obliged to inform our direct manager in a timely manner about the loss or damage of the property entrusted to us and to bear the responsibility enshrined in the internal rules of **the Company**.

- **Loyalty**

We are loyal to our customers and our employer. In communicating with the above employees, we are obliged to provide all information relating to making a specific decision. We must not express a personal opinion in a way that can be interpreted as an official position of **the Company**. In the performance of our duties, we observe full confidentiality of the information received, using it only in terms of the granting and servicing of the cash loan.

- **Commitment**

By helping to exchange ideas, facts and different points of view, we create conditions for improving the quality of the service offered by **the Company**. We recognize our responsibility both to those we work for and to our customers and partners. We are socially responsible citizens and employees.

III. PRINCIPLES OF PROFESSIONAL CONDUCT

The employees of **the Company**:

- build and maintain trust in the relations with our clients and partners by providing correct and comprehensive information;
- are honest and objective in their communication;
- ensure the transparency of information;
- do not disseminate misleading or false information, as well as personal data;
- adequately to correct unreliable information.

IV. RELATIONSHIPS WITH CLIENTS AND PARTNERS

1. Confidence

Trust and mutual respect are at the heart of the relationship between the company's employees and our clients and partners.

2. Engagement

Employees undertake to:

- work to build trust in relationships with customers and partners;
- protect the interests of clients and partners;
- observe the principles of confidentiality of information;
- create realistic expectations of final results;
- avoid actions and situations that would cause conflict.

3. The eight main promises of the ACOD to the Clients and Partners of the Company, which each employee is obliged to comply with and perform:

- We treat each client equally, regardless of gender, ethnicity, religious affiliation, age, social status, sexual orientation, education and state of health;
- We conduct our conversations and meetings with respect for the person and position of the client and maintain a good tone, regardless of the circumstances;
- In our conversations and meetings with the client, we are representatives of the Company and protect its good name and reputation as a correct partner;
- We do not take actions that would harm the dignity of the client and his family;
- We do not use abusive language towards the client, we do not make threats;
- We behave professionally in our relations with the client, we use a dictionary inherent in a specialized debt collection company;
- When talking to third parties, we do not disclose personal information regarding the Company and customers;
- These ethical standards apply to outgoing and incoming phone calls, customer meetings and in all work and out-of-work situations related to the Company's debt collection process.

V. RELATIONSHIPS WITH COLLEAGUES

1. Correctness and Tolerance

In relations with their colleagues, THE EMPLOYEES of the AKP are honest and tolerant by preventing conduct that undermines the dignity and rights of the individual.

2. Respect

The employee respects the opinion of his colleagues and respects their right to personal opinion and conduct (in accordance with this Code).

3. Confidence

Trust and mutual respect among colleagues are at the heart of the **company's** good and collegial relationships and sustainability. Each employee is obliged to strive to inspire confidence, to build one with colleagues in his team and not only to give due respect to his colleagues with whom he works and communicates.

4. Development and professionalism

The employee supports the professional growth of his colleagues and encourages and encourages the manifestations of high professionalism and morality.

5. Protection

Each employee, in defending his thesis of entitlement, must proceed from the protection of the interests of the company and then personal ones;

6. Solution to contradictions

Each employee should seek to avoid controversy and conflict with their colleagues. In the event that it fails and they are present and cannot be authorised by themselves, the employees are obliged to seek the assistance of their direct manager(s) in a timely manner.

7. Personal example

With their personal conduct and sense of responsibility, the employee should be an example to his colleagues.

8. Appearance

The employee must look in a way suitable for the environment in which he works, with his clothing and appearance consistent with his official position and the Company he represents - to be welcoming and to look neat.

VI. COMPETITION

1. In full compliance with the applicable provisions of existing national and EU legislation, the **Company** shall also make further efforts to establish the rules of fair competition in the financial services market. **The ACOD** shall refrain from using comparative advertising, even where permitted by law. **The ACOD** takes an active part in the activities of the branch organizations of which it is a member, standing in line with the principles set out in this **Code**. **The Company** does not tolerate compromises with these principles, even when this would give it competitive advantages over other market participants in the debt collection services market. **The ACOD** closely monitors scientific advances and technological developments. Particular attention shall be paid to innovation and in general the improvement of competitiveness by using new means and methods for creating and developing products and services.

2. **The ACOD's** employees shall compete on the basis of knowledge, skills and experience and shall avoid actions that undermine or implicate **the company's** professional reputation.

VII. PROTECTING THE ASSETS OF THE COMPANY

Employees undertake to protect **the assets** of the **ACOD** from destruction or misuse. In the course of their duties, each employee is obliged to:

- checks any financing, purchase, sale or transaction on behalf of **the Company**, based on fair criteria, with a view to protecting its interests;
- ensure full transparency in the selection of suppliers, goods and services, with a view to protecting the reputation of **the Company** and complying with the procedures laid down in the relevant internal rules;
- does not use for personal benefits assets or equipment which the **ACOD** has made available to it;
- does not permit the unregulated destruction, damage, unnecessary waste or waste of **the Company's** assets;
- provides only authorized access to **the COMPUTERS**, telephones, fax machines and other office equipment of the **ACOD**, effectively protecting access codes, passwords and equipment at all times, even when its workplace is left unattended for several minutes;
- protects the security of the **INFORMATION SYSTEMS OF THE ACOD**, ensures that no other software is installed or used by **the Company**;
- ensure that the security of information systems is not compromised.

VIII. CONFIDENTIALITY

- The confidentiality of the information provided by the client is ranked among the fundamental principles maintained by **the Company**. By assessing as essential the trust of its customers and partners, **the ACOD** applies effective risk minimisation measures related to particularly sensitive areas, including related to misuse or unnecessary use of information available to **the Company**. In this regard, **the ACOD** develops rules and policies ensuring the processing of the personal data of its clients and partners in accordance with the current national

and European legislation. The confidentiality of customers' personal data and customer trust with **the ACOD** are guaranteed, and each employee is obliged to:

- considers as strictly confidential, does not disclose or div pleading any direct or indirect information about the financial situation or other matters affecting **the Company**, its clients and established business relations with its partners;
- avoids any act or omission that may cause the leak or dissemination of information about clients or other counterparties of **the Company**;
- ensure that information, documents, files, printouts, etc. do not remain exposed to unauthorized access at a desk, cash desk or other place in **the ACOD**, especially left unattended even for a few minutes;
- does not disclose information by telephone, except where this possibility is expressly provided for in the relevant rules or has a legitimate request from a eligible public authority;
- ensure that any confidential document to be disposed of is completely destroyed;
- ensure that the relevant procedures for confidential communication in **the Company** are followed, in respect of any document or information about a service to be sent or distributed to another unit;
- avoids the possibility of eavesdropping by speaking in a reduced tone in the area of reception rooms, corridors, staircases or elevators on matters including any information that may be detrimental to **the Company** or customers;
- avoids being involved in discussions held during official or private meetings where information about **the Company** or its clients may be commented on, which should not be discussed.

IX. SPIRIT OF TEAMWORK

The success of **the Company**, as well as the provision and improvement of employees' remuneration, are based on the desire to work as a team that strives to be the best in its field of activity. To this end, each employee must:

- adapt quickly to the current conditions imposed by the requirements of its work;
- perform the tasks assigned to it with due care, especially when they are dictated by the conditions or the need to protect the interests of **the Company**;
- not to be limited in the role of passive contractor of the instructions, but to develop initiatives concerning the most rational meeting of the needs of day-to-day work, taking into account the law and hierarchy, with a view to protecting and supporting the interests of the **ACOD**;
- not to speak to the media on behalf of **the Company**, not to give interviews, to write articles or to make other publications in newspapers, magazines, other media and social networks about **the ACOD** and its activities, without prior consent and approval from the management of **the Company**.

X. IMPLEMENTING MEASURES

1. This **Code** applies to all persons acting on behalf and on behalf of **the ACOD** and shall apply in a uniform manner to all employees of the company, regardless of their hierarchical level and contractual relationship.

2. This Code has been adopted by the management of „**AGENCY FOR CONTROL OF OUTSTANDING DEBTS“ EOOD** and approved by the Manager on 07. 08.2020 year The Code of Ethics shall be published in the respective directory of the company's server space and shall enter into force from the same date as supplementing the incumbent Code of Ethics.

3. On the day of signing the contract with „**AGENCY FOR CONTROL OF OUTSTANDING DEBTS“ EOOD**, the direct head of the newly appointed employee is obliged to familiarize him with the provisions of this **Code**.

4. All company cases with the subject of the professional, ethical and labor conduct of the employees of „**AGENCY FOR CONTROL OF OUTSTANDING DEBTS“ EOOD** shall be reviewed and decided by a pre-selected Ethics Committee, which is appointed by an order of the employer.

5. Acts and/or omissions incompatible with the conduct under this **Code**, the Company's Internal Labour Order Regulations and all internal rules governing specific obligations and providing for penalties for their non-compliance shall be grounds for in engagement of property liability, disciplinary action and/or termination of the employee's contract with „**AGENCY FOR CONTROL OF OUTSTANDING DEBTS“ EOOD**.

The current version of this Code of Ethics of the Company is from 07.08.2020.

Yanislav Yanakiev:

General Manager of

**„AGENCY FOR CONTROL OF
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