

Balkancar ZARYA AD

Human Rights Protection Policy

English translation for information purposes only. In the event of discrepancies between English and Bulgarian version, the Bulgarian version shall prevail.

The Human Rights Protection Policy applies to all employees of Balkancar ZARYA.

1. Policy objective

In our activities and business relationships, we do not wish to be, directly or indirectly, a participant or cause of human rights violations. Our goal is to prevent possible violations of human rights and to improve their condition whenever possible, expecting the same from our counterparties. Respecting the human rights of our workers and employees, along with those in our value chain and the communities in which we operate, is the cornerstone of our policy.

The Human Rights Protection Policy is consistent with our values and guiding principles set out in our Code of Conduct, as well as our anti-discrimination, environmental, health and safety policies and Supplier Code of Conduct. The Human Rights Protection Policy also reflects the principles contained in:

- the Universal Declaration of Human Rights,
- the International Labor Organization Declaration on Fundamental Principles and Rights at Work
- the UN Global Compact
- the UN Guiding Principles on Business and Human Rights
- ISO 45001 Occupational Health and Safety Management (OHS) Standard

2. Respect for human rights

Balkancar ZARYA recognizes the importance of maintaining and promoting the basic human rights of workers and employees, acting within the framework of programs and policies:

- Promoting a workplace free of discrimination and harassment;
- Prevention of child labor, forced labor and human trafficking;
- Provision of fair and just wages, benefits and other conditions of employment in accordance with local legislation;
- Provision of healthy and safe working conditions;
- Respect for employees' rights to freedom of association and collective negotiation;

Failure to comply with the following Company standards of conduct designed to protect the human rights of our employees may result in disciplinary action and sanctions.

3. Forced labor and human trafficking

Balkancar ZARYA prohibits the use of all forms of forced labor, including prison labor, forced labor, bonded labor, military labor, slave labor, and any form of human trafficking. No use of corporal punishment or threats of violence or other forms of physical, sexual, psychological or verbal abuse as a method of discipline or control will be tolerated in the workplace.

4. Discrimination

The Company prohibits any form of discrimination or harassment based on age, race, sex, national origin, religion, gender identity, disability, sexual orientation, pregnancy or other status protected by applicable law. The basis for the appointment of employees in the Company is their qualification, skills and experience.

We value the diversity and unique contributions of our employees and have a long-standing commitment to equal opportunity and zero tolerance for discrimination and harassment.

5. Child labor

The Company prohibits the employment of persons below the local statutory minimum working age, or the compulsory schooling age, whichever is higher. Younger workers may be employed through company-approved short-term apprenticeships, traineeships or work experience programs but are never permitted to perform work that may endanger their health and safety or interfere with their education or vocational guidance and training.

6. Safe and healthy working conditions

Balkancar ZARYA provides and maintains a safe and healthy workplace and complies with applicable laws, regulations and internal safety and health requirements. We are dedicated to providing a safe workplace by minimizing the risk of accidents, injury and exposure to health risks. We are committed to engaging our employees in the continuous improvement of health and safety working conditions in our workplaces, including the identification of

hazards and the elimination of health and safety issues. The company provides appropriate work clothes and personal protective equipment to its workers. A health and safety management system at work has been implemented and certified according to the requirements of ISO 45001.

7. Security at the workplace

The Company provides and maintains a work environment free from violence, harassment, threats and other unsafe or disruptive conditions due to internal and external threats.

8. Freedom of association and collective bargaining

Balkancar ZARYA respects the right of our employees to join, form or not join a trade union without fear of reprisals, threats or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely elected representatives.

The Company undertakes to negotiate in good faith with such representatives.

9. Working Hours, Wages and Remuneration

The Company compensates its employees competitively with the industry and complies with all applicable local laws governing the payment of wages and benefits, hours of work, overtime and fringe benefits.

10. Complaint Reporting

The Company encourages all employees to report violations of the Human Rights Policy through one of several channels available to them without fear of reprisal.

Employees can contact:

- their immediate supervisor or manager at the next level;
- Human Resources Manager and Personal Data Protection Officer;
- [Whistleblowing line](#) (available by phone or email address);

Balkancar ZARYA is ready to investigate and respond to any concerns of its employees and workers and to take necessary corrective actions in response to possible violations.

Punitive action against an employee for reporting a problem in good faith is a violation of our [Code of Conduct](#) and the [Whistleblower Policy](#).

11. Validity

This policy was adopted by the Board of Directors of Balkancar ZARYA on August 26, 2023 and is in effect from that date until further notice.

12. Responsible person

This Policy has been prepared by the Head of Human Resources and Responsible Person for Personal Data Protection, who is also responsible for keeping this Policy updated. The policy is subject to periodic review and updating as required to amend it to changes in business processes, regulatory requirements as well as societal expectations.

13. Protection of personal data

Balkancar ZARYA takes its obligations under the General Regulation on the Protection of Personal Data Regulation (EU) 2016/679 and the relevant Bulgarian legislation seriously and strives to comply with the highest applicable standards and established good practices in the processing of personal data.

The competent leading supervisory authority regarding the protection of personal data processed by "Balkancar ZARYA" JSC is the [Commission for the Protection of Personal Data of the Republic of Bulgaria - CPDP](#).