



CODE OF CONDUCT

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MESSAGE FROM BALKAN PRO TRAVEL

We care about one another, our customers and the members of our communities. This fundamental respect underpins our company values and shapes our Sustainability approach. And we bring it to life in the way we operate, day in and day out.

This Code of Conduct sets forth the standards by which we, as a collective organization and as individuals, should act. It gives an ethical and legal framework for our day-to-day activities and offers guidance for dealing with challenging situations.

We put our trust in each of you to exercise good judgment and act in a manner that reflects favorably upon yourself and our company. We have to work together to maintain our reputation as a good corporate citizen and trusted advisor. We're all responsible for upholding the Code.

On behalf of our customers, suppliers and colleagues, thank you for your commitment to the Code of Conduct and the values in which it's rooted.

Diana Tilkova, General Manager

OUR VALUES

Act with purpose

We are purposeful in how we innovate and what we create.

Do what's right

We operate openly and foster transparently. Our work is our bond.

Give your best

Passion powers and inspires us. We love and believe in what we do.

Solve it together

Collaboration connects us. We challenge and improve together.

CODE OF CONDUCT

Note: “We” and “BPT” refer to Balkan Pro Travel company. “You” refers to the employees or third party reading this code.

This Code of Conduct (or “Code”) translates our corporate values into general conduct rules that apply to daily business. The Code applies to all employees and third parties acting on behalf of BPT.

1. EMPLOYEES

1.1. **Respect, equal treatment and health safety**

We deal openly and honestly with our employees in all matters related to their employment, work environment and professional development. We won't discriminate (or tolerate discrimination by our employees) against any applicant or employee based on any characteristic protected by law. We promise to protect you from unreasonable health and safety risks on the job. We meet reasonable expectations concerning the work environment and strive to protect our customers, the public and the environment in the use of BPT facilities and services.

1.2. **Employee privacy**

In order to make our internal processes and procedures as effective and efficient as possible, we collect and maintain personal information related to our employees. Access to this information is restricted to authorized people on a need-to-know basis. We will never release personal information to outside parties without your prior approval, unless we're legally required to do so.

Employees who have access to personal information must make every effort to protect it from any disclosure which would violate a law or company policy.

1.3. **Conflict of interest**

Work-related decisions must not be influenced by personal considerations. Therefore, you must avoid any activity that could conflict with your responsibilities and loyalty towards our company. No employee, relative or other third party can benefit from his or her position due to a conflict of interest. When a conflict of interest is identified, we'll always seek to resolve it in a mutually acceptable way, on a case-by-case basis.

1.4. Business secrets / insider trading

During your employment with our company, you may be given access to information about BPT, our customers and/or service providers that hasn't been made public and could be of benefit to you. The use of such non-public information about our company, customers or service providers for personal or third party benefit is strictly prohibited and may constitute a violation of law.

1.5. Social media

When you use public social media accounts, avoid comments that are derogatory or damaging to our business, business practices or performance, employees, colleagues, competitors or clients.

We're natural partners with our clients, colleagues, and our community, and we're at our best when working together to produce extraordinary results.

2. CUSTOMERS, COMPETITORS AND THIRD PARTIES

2.1. Data protection, information Security and privacy

We protect the confidentiality, integrity and availability of information we have access to in accordance with applicable laws and contractual obligations. It's essential that we safeguard the personal data of customers, competitors, third parties and employees from infringement, and use it only for the purposes for which it's collected. Our safeguards apply to the reception, collection, use, transfer, processing, storage and deletion of personal data.

To learn more about data protection and privacy, please contact us (office@balkanprotravel.com).

2.1.1. Company proprietary information

Company proprietary information is any information relating to our current and future products, services, or research; business or marketing plans or projections; earnings, income and other financial data; personnel information, including organizational changes; and software. No one may disclose or distribute this information without authorization by our company. You must follow all company safeguards for protecting this information.

2.1.2. Anti-bribery and corruption

Bribery and corruption generally involve receiving, giving, promising, authorizing or offering anything of value to someone in order to obtain or retain a commercial advantage, or to encourage or reward the recipient for acting improperly. If this is done in a business relationship, it constitutes bribery. If it's done in a government relationship, it constitutes corruption. We don't tolerate bribery or corruption in any circumstances.

2.1.3. Government officials

Government employees or public officials, government agencies, government-owned or controlled entities and facilitated payments often have specific and stringent ethical and legal standards relating to bribery. You should provide nothing of value to government employees unless clearly permitted by law and applicable regulations. Be aware as well that political contributions, charity contributions, donations and sponsoring activities can be used for bribery or corruption purposes.

2.2. Gifts and entertainment

We allow commercial business gifts and entertainment that are reasonable in nature, frequency, and cost. Reasonable business gifts and entertainment might include a lunch, dinner, or occasional sporting or cultural event; gifts of nominal value; entertainment at facilities of the company; or authorized transportation in BPT vehicles. Reasonable business entertainment also includes traditional promotional events sponsored by the company

2.3. Money laundering

Money laundering is the process of concealing funds raised from illegal activity and making these funds look legitimate. We neither facilitate nor tolerate money laundering. We must make or receive payments only via authorized processes and channels, and document those payments properly. We'll reject any business transaction which requires any form of money laundering.

3. HUMAN RIGHTS, SEXUAL EXPLOITATION OF CHILDREN AND ADOLESCENTS

3.1. Human rights

BPT partners comply with all relevant national laws protecting the rights of employees. Basic Rights:

- BPT or the supplier shall not discriminate based on gender, age, religion, race, tribe, caste, social background, disability, nationality, membership in workers' organizations, political affiliation, sexual orientation, or any other personal characteristics.

- All employees shall be free to enter their employment with the supplier through their own choice and shall also be free to terminate their employment when they choose without penalty, as long as the process occurs in accordance with the (oral or written) employment contract.
- All forms of forced labour are forbidden.
- The freedom of association and the right to collective bargaining shall be recognized by the supplier.
- Workplace practice and conditions which violate basic rights are not allowed: Physical abuse or punishment or threat of physical abuse or punishment, any kind of sexual or other harassment and other forms of intimidation are prohibited.
- The supplier provides a means through which staff can make representation to senior management about key employment issues. The supplier provides for an effective complaints procedure through which employees may raise grievances (including those about harassment) and seek redress.

3.2. Sexual exploitation of children and adolescents

BPT does not allow or tolerate child prostitution at the premises and facilities of subcontracted suppliers. Any suspicious behaviour must be reported to the local authorities immediately.

BPT will terminate the contract early with any party that fails to take reasonable steps to prevent the sexual exploitation of children within the direct supply chain (e.g. accommodation, excursions, etc.).

4. ENVIRONMENT, LOCAL SOURCING AND BENEFITING COMMUNITIES

4.1. Environment

BPT chooses to cooperate with suppliers striving to minimize their negative impact on the environment by:

- actively reducing the amount of energy and water used minimizing the use of chemicals known to cause damage or pose risks to health and/or the environment
- reducing the use of single use plastics in accommodations and during excursions
- Complying with mandatory national and international law, particularly in regard to the procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, emissions and effluent treatment
- Monitoring and controlling wastewater & solid waste generated and treating it as required prior to discharge or disposal. Waste of all types shall be reduced to the greatest extent possible by the supplier.

4.2. Local sourcing and benefiting communities

BPT and the supplier shall actively choose locally produced goods in preference to imported ones wherever possible.

The supplier shall promote local products and services to guests, by recommending guides, restaurants, markets and craft centres wherever possible.

5. FINANCIAL INTEGRITY

5.1. Books and records

Our company's books, records, and accounts must accurately and fairly reflect our transactions in reasonable detail.

We formalize all arrangements with third parties such as distributors, licensees, and suppliers in a written contract or agreement. The contract or agreement must provide a clear description of the services to be performed and/or the products to be delivered. Services and products will be performed and delivered against reasonable fees and/or reasonable prices. We must maintain proper documentation of all contracts and agreements.

5.2. Business assets

We don't permit the use of any company assets for an unlawful or improper purpose. Protecting company assets, which specifically include intangible assets such as customer accounts and intellectual property related to travel service processes and systems, is critical. You are personally responsible for doing so.

6. RESPONSIBILITY

This Code has been approved by Balkan Pro Travel and it is everyone's responsibility to ensure that their actions are in accordance with it.

6.1. Reporting violations

Violations of this Code may result in disciplinary action. You are strongly encouraged to report any misconduct to the management team immediately.