

Contents

1. Scope and Application	2
2. Law Compliance and Anticorruption Behavior.....	3
3. Principles of Business Conduct	4
3.1. Integrity	4
3.2. Objectivity	4
3.2.1. Conflict of Interest.....	4
3.2.2. Personal relationship, attraction, and preference	5
3.2.3. Personal threat or pressure.....	6
3.2.4. Other undue influences.....	6
3.3. Quality	7
3.3.1. Competence	7
3.3.2. Attention.....	7
3.3.3. Continuous improvement.....	7
4. Openness and Periodic Updates	8
Appendix 1: Declaration of Acceptance of Bulgaria Foods Business Conduct Policy.....	9

1. Scope and Application

This Business Conduct Policy (also called the Policy in this text) is mandatory for all activities of (or with) Bulgaria Foods Ltd (also called in this text Bulgaria Foods or the Company).

All managers and employees (working with a management, labor, civil, or other contract), agents (representing or acting in the name of Bulgaria Foods according to a written or verbal agreement), contractors (of orders, projects or activities, assigned by Bulgaria Foods), suppliers and providers (of materials, goods, or services for Bulgaria Foods), and other partners in current business relationships with Bulgaria Foods must get familiar with the contents of this Policy and abide in all situations to its principles and rules.

Whereas Bulgaria Foods could not legally enforce its internal policies to representatives of other entities, all current and potentially contracted (or in other way associated) entities should accept and follow the main principles and rules of this Policy (or their own internal policies, in substance equivalent to this).

Bulgaria Foods highly values the qualities and reputation of its suppliers, providers, agents, contractors, and other business partners. Without them the Company would not be able to achieve its goals and operate at the highest business standards. Therefore, these positions are conditionally considered a part of Bulgaria Foods extended team. All positions listed in this paragraph (both internal and external) are therefore called in this text the Extended Team. The part of the Extended Team comprising Bulgaria Foods personnel (internal positions) is called the Team.

The principles and rules of this Policy should be understood and applied in their broad sense, beyond the boundaries of the explicit definitions and presented cases.

Each member of the Team should actively avoid situations that may create actual or apparent conditions for a breach of this policy's principles and rules.

2. Law Compliance and Anticorruption Behavior

Bulgaria Foods Business Conduct Policy requires all managers, employees, agents, contractors, suppliers, providers, and other business partners to comply with all relevant commercial, labor, social, and anticorruption regulatory frameworks, including national and international laws, standards, and principles in all jurisdictions where the Company operates.

Any violation of either the applicable regulations, or of the anticorruption principles and rules of this Policy shall be considered a major offence and shall result in disciplinary measures, contract terminations and consequent punitive actions (including lawsuits) against the managers, employees, agents, contractors, suppliers, providers, or other business partners involved.

Equally shall be treated any form of abuse of position occupied with (or admitted to) Bulgaria Foods Ltd with the intention of personal (or collective) advantage beyond the normal remuneration and benefits in accordance with official and legitimate contracts, provisions, or other valid documents.

3. Principles of Business Conduct

The fundamental principles of business conduct of Bulgaria Foods Ltd are integrity, objectivity, and quality. These principles and the rules related to them are considered in the following three sections.

3.1. Integrity

Members of the Extended Team act with and promote integrity in all their business relations and behavior.

Within the meaning of this Policy integrity comprises open and honest communication, truthful presentation of facts to all stakeholders, as well as fair and conscious respect to their interests in every situation.

Depending on the situation, stakeholders could be the Company's shareholders, managers, or employees, as well as clients, agents, suppliers, institutions, authorities, professional organizations, etc.

3.2. Objectivity

Members of the Extended Team approach every situation and every business decision objectively and without bias.

Within the meaning of this Policy objectivity is an approach driven by the goals of the business activity with conscious and continuous absence of bias and undue influence.

The causes of undue influence include (but are not limited to) conflict of interest, personal relations, and personal threat or pressure. These are considered in the following three paragraphs.

3.2.1. Conflict of Interest

Conflict of interest is a situation where the personal interest of a member of the Team contradicts the interest of the Company or the Society. For example, a situation with a conflict of interest is the choice of a supplier where the decision maker (or his family) has material interest. Similarly, conflict of interest is present in decisions (regarding projects, technology, payment terms, etc.) where decision makers will

receive additional compensation or benefits, while the particular choice is sub-optimal for the Company or its stakeholders.

Bribery is a specific factor creating conflict of interest. It is the proposal or acceptance of goods, benefits, or favors by a member of the Team in order to induce decisions, choices, or behavior, otherwise not expected in the normal activity or responsibility of the receiving party. Bribery is strictly forbidden for managers, employees, agents, contractors, suppliers and other business partners of Bulgaria Foods Ltd.

Members of the Extended Team are required to avoid not only actual but also apparent conflict of interest as well as any real or perceived general breach of the Objectivity principle. Actual and even perceived violations of principle can harm the reputation of the Company, its business partners, as well as the moral of employees and contracting parties.

Every gift or favor presented to a manager, employee, or agent of Bulgaria Foods, especially gifts and favors of value significant for the person receiving them, could be interpreted as bribery and create suspicion for conflict of interest. Therefore, this Policy explicitly prohibits Bulgaria Foods managers and employees to accept gifts or favors from external parties with former, current, or potential business relations with the Company (suppliers, providers, agents, contractors, and other business partners) or internal parties (other managers and employees).

Gifts between managers, employees, or agents are acceptable on regular celebration (e.g., New Year, birthday, etc.) or exclusive occasions (e.g., marriage, child birth, graduation, etc.) as long as these are presented publicly, with knowledge or approval of the other team members, and are not significant in value to the person receiving them.

Gifts with immaterial value with advertising purposes (branded calendars, notebooks, pens, sweets, drinks, etc.) may be accepted within the boundaries of a marketing campaign, beginning or end of annual working cycle, contract, project or equivalent.

3.2.2. Personal relationship, attraction, and preference

Members of the Team are required to consciously avoid situations, where their professional judgement or decisions could be influenced by personal relationship, attraction, or preference rather than the Company's objectives and stakeholders' needs.

In order to avoid actual or apparent conflict of interest, it is unacceptable for hiring, termination or remuneration of employees, supplier selection, project assignment, pricing or similar decisions to be made or influenced by persons with family, intimate or friendly relationships to the positions affected. It is also unacceptable to use such relationships in order to obtain contracts, projects, or beneficial prices from external parties.

In situations where a Team member has to make (or to be affected by) a decision involving personal relationship, the Team member is required to disclose this fact to all other positions affected and particularly to Bulgaria Foods management. If this Team member's participation in the decision cannot be avoided, management should undertake specific measures to eliminate the influence according to the situation (panel decision, voting, evaluation, competition, tender, etc.).

Personal relationships could also generate objectivity bias in their negative forms (antipathy, intolerance or prejudice). The rules applicable to avoiding and eliminating such influences are equivalent to the ones listed in the current paragraph.

3.2.3. Personal threat or pressure

Making decisions under personal threat or pressure could cause violations of the objectivity principle. All forms of personal threat and pressure are inadmissible for managers, employees, and agents of Bulgaria Foods Ltd. In every attempt for personal threat or pressure coming from external parties including former, current, or potential suppliers, contractors, clients or other (companies, organizations or persons), members of the Team are required to inform immediately the Company's management. If there is any doubt that illegal behavior could be expected, the Company's management must seek the opinion of its legal advisors and (if appropriate) inform the authorities.

Personal threats may take the form of physical danger, dominating character, fear of workplace or income loss, fear of loss of an important client or a significant project, fear of confidential information disclosure, etc.

Pressure is any form of compulsion or coercion towards acts or behavior outside of the legitimate and contractual relations and the normal business activity of the Company and its stakeholders.

The strict requirements for discharge of obligations, for completion of work tasks or projects, and for efficiency or effectiveness in the achievement of economic and social goals of Bulgaria Foods Ltd could not be qualified as personal threats or pressure, as long as these are performed within contract-based relations and applicable regulations.

3.2.4. Other undue influences

The undue influence types listed in the previous three paragraphs do not exhaust all potential causes of undue influence. Members of the Team are required hereby to operate with continuous awareness for identification and elimination of undue influence in every business situation.

3.3. Quality

The strive for quality is a fundamental principle for the Extended Team of Bulgaria Foods. It extends not only to the highest standard of quality for products and services provided to our Clients, but also to the highest standard of quality for every other task, project or process in our business activity, economic efficiency, technological development, social responsibility and environment protection.

The strive for quality is based on competence, attention, and continuous improvement. These foundations of quality are considered in the following three paragraphs.

3.3.1. Competence

Members of the Extended Team are expected to maintain a competence level sufficient to adequately perform their functions and roles within the Company's business activity. Competence is not a one-time achievement. It is a continuous process of acquisition and application of knowledge, experience and skills, as well as a constant intellectual effort directed at achievement of business objectives of the Company, its stakeholders and business partners.

3.3.2. Attention

The strive for quality is based on the keen attention of all members of the Extended Team in the form of continuous care, focus on all aspects of quality, as well as conscious efforts to achieve the highest standards in every particular endeavor, task, project or process of the business activity.

3.3.3. Continuous improvement

The strive for quality does not end with achieving of a certain quality level or fulfilling the requirements of certain instructions, policies, specifications, and standards. It is a continuous process requiring the members of the Extended Team to actively search and apply opportunities for improvement in every aspect of business activity.

4. Openness and Periodic Updates

Bulgaria Foods Business Conduct Policy is open and inclusive. Notwithstanding the perpetual, long-term character of its fundamental principles, the Policy's definitions, rules, and examples may evolve with the diversity and dynamism of the Company's business activity and relations.

New developments in business environment, the Company's experience and the applicable regulatory frameworks may require specific changes or amendments to the core contents and meaning of the Policy.

A regular review and discussion of the need for update is performed during the first quarter of each calendar year. The annual review involves participation of Bulgaria Foods management and stakeholders' representatives and is administered by Bulgaria Foods management.

Appendix 1: Declaration of Acceptance of Bulgaria Foods Business Conduct Policy

Name:

Position:

Company (where applicable):

I have read and understood the Business Conduct Policy of Bulgaria Foods Ltd (also called the Policy in this text) and I am fully familiar with its contents.

I hereby agree, as long as I participate in Bulgaria Foods Ltd.'s business activity or relations, to comply with the Policy's principles and rules in their broad sense, to avoid any situation that could be interpreted as an actual or apparent violation of these principles and rules.

If I become witness of a breach in the Policy's principles and rules or I am invited to participate in such a violation, I hereby agree to immediately inform the management of Bulgaria Foods Ltd.

Date:

Signature:
