

Approved by: Dragomir Ivanov,
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Anti-trust Policy for Fair Competition

Fair competition is a key driver of economic growth. The anti-trust legislation of the Republic of Bulgaria, the European Union and other jurisdictions protects competition and enables free economic activity.

It prohibits agreements, decisions, concerted practices, abuse of monopoly or dominant positions and any other acts that could prevent, restrict or distort competition. It also regulates the control of mergers and acquisitions to prevent the creation of cartels.

Violations of anti-trust law can have a severe impact on the economic environment; penalties can reach millions of euros and may have serious consequences for the entire company. Staff responsible for breaches may face civil and criminal liability. Green Innovation AD is committed to carrying out its economic activities in compliance with all applicable antitrust laws.

Our policy requires the Managing Director and all employees to avoid any agreement or plan—formal or informal, direct or indirect—that could violate competition rules. We seek to prevent not only actual breaches but also records, conversations or statements that might create the impression of an anti-trust violation.

Prohibited activities

The following behaviours are unprofessional and strictly forbidden:

- 1. Discussing prices with competitors.**
- 2. Exchanging information that influences prices.**
- 3. Participating in meetings with competitors** that could lead to the exchange of information on customers, prices, costs, business practices or commercial strategies.
- 4. Entering into agreements with competitors not to enter each other's markets.**
- 5. Joining forces with competitors** to give an advantage to other competitors, customers or suppliers.
- 6. Offering sale prices below the required level** to discourage a new entrant or force a competitor out of the market.
- 7. Tying the sale of one product to another.**

Guidance and enforcement

Antitrust law is complex. Whenever issues arise, employees must consult the company's legal advisers. Agreements or arrangements with competitors are acceptable only if they comply with antitrust law and have been approved by the legal team before taking effect. Green Innovation AD will develop an active risk-management programme to avoid breaches.

The programme aims to identify when an agreement is compatible with the law and to detect situations that could become critical or unlawful. It will monitor all agreements, verify their compliance, and provide active training for managers and staff with access to confidential commercial information.

The direct involvement of senior management underscores the importance of compliance for the company. Employees are encouraged to report any possible violation of anti-trust legislation directly to the Managing Director. If the above rules are violated, disciplinary measures will be imposed as provided by law. No exceptions are foreseen and no one is authorised to act in contravention of this policy.