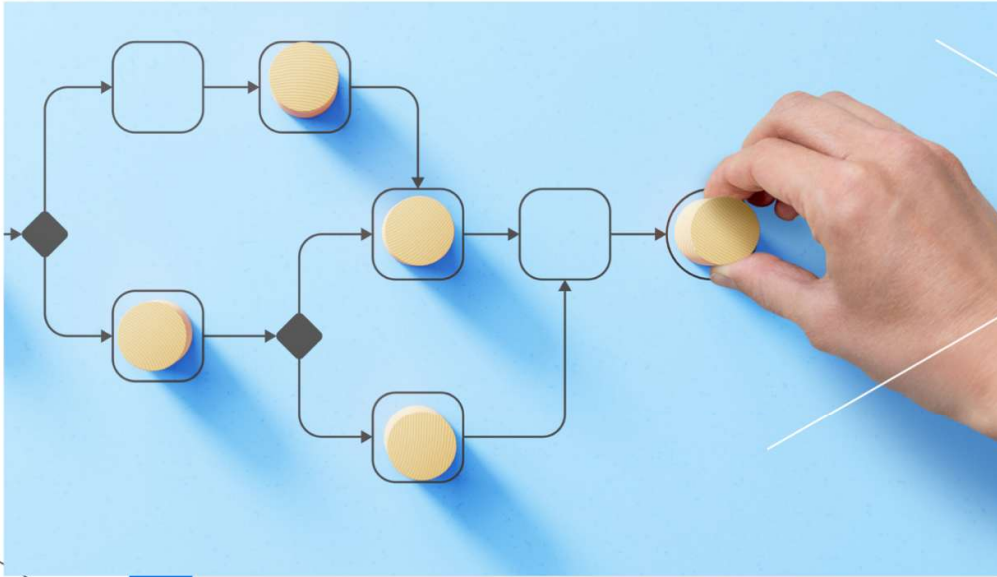




Environmental Management and Protection Policy

Telelink Business Services Group

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1. Purpose of this document

The environmental management and protection policy of Telelink Business Services Group (for short: TBSG or The Company) focuses on achieving and demonstrating stable environmental results by identifying and controlling the impact of the organization's activities on the environment.

As part of its broader sustainability framework, TBSG conducts comprehensive ESG impact assessments and ESG risk assessments to evaluate both the positive contributions and potential risks associated with its operations, products, and partnerships. These assessments enable the Company to make informed decisions, align its practices with international ESG standards, and continuously improve its environmental and social performance.

In the conditions of intensifying competition and the continuous increase in the requirements of our customers, partners and suppliers, the company is empathetic and committed to the effective management and protection of the environment.

2. Scope of application

This Policy applies equally and with equal weight to all employees of Telelink Business Services Group, including for the employees of each company in which Telelink Business Services Group controls more than fifty percent (50%) of the voting shares, regardless of the country in which the business is conducted.

This policy should also apply to all partners, vendors, suppliers, subcontractors, and service providers with whom the company works, so it could provide services to its customers.

3. Responsibilities

All company employees perform their duties and responsibilities in accordance with the Environmental Management and Protection Policy.

The management team of Telelink Business Services Group takes the needed actions to ensure the necessary organization and provides the proper conditions for the protection of the environment.

4. Environmental management and protection policy

Telelink Business Services Group understands and effectively manages the real and potential impact on the environment that the activities of service provision to our customers have.

All activities are carried out with particular attention to sustainability and careful use of natural resources and in compliance with all applicable legal requirements.

Telelink Business Services Group is dedicated to managing all activities and operations that may have an impact on the environment. The company upholds the following commitments:

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- Participation of the management team of Telelink Business Services Group in determining the goals, guidelines and tasks related to the management and protection of the environment;
- Participation of the entire team of Telelink Business Services Group and the use of its potential for the implementation of the current policy;
- Determination and implementation of the necessary processes for environmental management and protection and a systematic approach to their management;
- Strive to prevent environmental pollution and minimize the use of natural resources to achieve continuous improvement of environmental performance;
- Knowledge of legal and regulatory requirements regarding the environment and ensuring compliance with them, as well as with other requirements adopted by the organization;
- Providing and maintaining a workspace, work environment, equipment and work systems that do not endanger the environment;
- Prioritizing the development of a positive culture in every activity and striving for their continuous, purposeful improvement;
- Provision of the necessary resources to ensure effective and efficient environmental protection.

4.1. Climate change

Telelink Business Services Group fully understands the importance of the climate change topic and the effects of climate change for the Planet. The Company is committed to reducing greenhouse gas emissions to support and reach the global target to keep global warming under 2°C, as it is laid down in the Paris Agreement.

TBSG will calculate its emissions in Scope 1 and 2 including the seven Greenhouse Gases (GHG) carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PCFs), sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃) listed in Kyoto Protocol.

4.1.1. Climate change mitigation

Climate change mitigation is one of the most important focus areas that organizations around the world must consider in the next few years. As a multinational organization, TBSG understands its important role, and it is ready to take necessary measures in order to support the global target to keep the global warming under 2°C by decreasing generation of greenhouse gas emissions in operations.

The main measures that The Company will take are:

- **Energy savings**

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As it is one of the main resources that TBSG uses, energy consumption control is very important for the company. This is why the latest generation electronic and electrical appliances are purchased for all TBS offices. In addition, where this is possible, automated control of air conditioning, ventilation and heating and smart lightening control system is applied.

- **BREEAM certified offices**

As an environmentally responsible company, TBSG is choosing certified buildings for its offices where this is possible. The biggest office, located in Bulgaria is located in BREEAM certified building. This certification provides assurance of a sustainably constructed environment.

- **Recycling waste**

TBSG is committed to recycling as much as possible of the waste generated in its operations. Plastics, paper and electronic waste are the most generated types of waste, and The Company has system and contracts for recycling of that waste.

- **Encouraging online business meetings**

As and technological company, TBSG encourages its employees to use the possibilities to perform their meetings online, without unnecessary trips. The modern technology gives the opportunity to “meet” your colleagues and business partners virtually, which decrease our negative environmental footprint.

- **Home office opportunity**

As modern company, TBSG gives the opportunity to its employees to work remotely, which decreases the amount of GHG emissions generated from their commuting.

4.1.2. Climate change adaptation

Climate change is already a reality, impacting people worldwide. Climate adaptation is a crucial process for countries, organizations, and individuals alike. As a technology sector company, TBSG fully recognizes its role and responsibility in this process, providing organizational and technological support to countries and communities within its areas of operation.

By implementing its new technological solutions, TBSG delivers tools that aid in flood prevention, thereby mitigating damage and its consequences for both people and the state.

4.1.3. Energy efficiency and renewable energy

Energy production is a major source of greenhouse gas emissions; therefore, both energy-producing organizations and energy users share the responsibility to find solutions that minimize negative environmental impacts.

There are two ways to complete this significant task:

- To strive for energy efficiency;
- To promote, support and use of energy from renewable sources.

TBSG promotes energy efficiency by purchasing the latest generation of electronic and electrical appliances. Wherever possible, the company implements automated control systems for air conditioning, ventilation, and heating, as well as smart lighting control systems to conserve energy.

4.2. Pollution

Industrialization, technological development, and mass consumption are factors that affect the local environment. Environmental pollution not only poses risks to human health but also leads to biodiversity loss and diminishes ecosystems' capacity to sequester and neutralize carbon emissions.

Pollution is a challenge not only for states but also for companies and individuals. TBSG recognizes its responsibility to minimize pollution generated during its operations and within the areas where it operates.

The Company is committed to the EU's "zero pollution ambition" and takes action across three main areas: air, water, and soil pollution.

TBSG views the goal of pollution reduction as integral to promoting social equity. Vulnerable groups—such as children, the elderly, and people with disabilities—are most affected by the negative impacts of environmental pollution, and their health remains at risk until all responsible parties take action.

The Company conducts periodic assessments of potential environmental impacts, with all types of pollution strictly monitored and managed.

In line with the zero-pollution hierarchy outlined in the EU Zero Pollution Action Plan, TBSG actively works to prevent the generation of key waste types produced during its operations, including plastics, paper, electronic waste, and harmful vehicle emissions.

Prevention of waste generation is the top priority. TBSG employees follow the guiding principles of:

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- If a hard copy is not required, documents should not be printed. All Corporate documents could be found in digitalized version on The Company SharePoint portal.
- When possible, internal business meetings should be held online.
- When possible, business trips should be avoided and meetings with business partners should be held online.
- TBSG is committed to providing technological solutions which prevent or track environmental pollution.
- Within the company, specialized service providers should be used for the maintenance of the fleet and equipment, such as printers, that may produce hazardous waste.

Since the generation of all types of waste cannot be completely avoided, the next steps in TBSG's operations are elimination and remediation.

- Waste management system is developed and implemented in all sites of TBSG.
- Recycling is the main method for waste treatment in The Company.

4.3. Water and marine resources

Water is essential for life, yet only about 3% of the Earth's water is suitable for drinking. With this in mind, all states, organizations, and individuals must use this vital resource responsibly.

According to the UN SDG Report 2022, 2 billion people live in areas without adequate drinking water services, and 1.2 billion lack even basic access.

TBSG recognizes its responsibility to monitor and reduce its water footprint and contribute to a positive global impact. The Company is committed to minimizing water consumption in its operations wherever possible and implements water-saving solutions when feasible. Additionally, TBSG collaborates with environmentally responsible suppliers who prioritize the protection of water resources.

Water is crucial not only for people but also for animals and plants. Oceans, seas, rivers, and wetlands are ecosystems that must be preserved. Population growth and climate change pose threats to these water-related ecosystems, and TBSG is committed to operating in ways that protect them and prevent further degradation.

4.4. Responsible use and circular economy

Responsible use of resources and circular economy are some of the most important elements of environmental protection management.

If people and companies continue their current patterns of living and working, resource consumption could double, and waste generation could increase by over 50%. These trends can only be halted - or at least slowed - through a circular economy.

As a member of the technology sector, which consumes a wide range of raw materials, TBSG recognizes its responsibility to use resources responsibly and is committed to implementing the principles of a circular economy.

The main principles that The Company is implementing are:

- **Refuse:**
 - Refuse to buy/use something that The Company or employees don't need.
 - When it is possible, The Company refuse to buy/use in its operations products that are for single use and that are low quality.
- **Rethink:** think twice before buying any product.
- **Reduce:** use and buy only what is needed.
- **Reuse:** if products or some of their components could be used again, this possibility is exploited by The Company.
- **Repair:** before throwing out any product, first try repairing it.
- **Remanufacture/repurpose:** if a product can no longer be used as a whole, it should be examined to determine whether any components can be repurposed in another product of the same type or if its function can be adapted for a different use.
- **Recycle:** all types of waste, generated in TBSG operations, that could be recycled must be recycled.

By adhering to the principles outlined above, TBSG ensures a reduction in raw material consumption and a decrease in waste generation.

To implement this policy and fulfill its commitments to environmental management and protection, Telelink Business Services Group relies on effective and efficient processes, the development and adoption of new technologies, and a team of trained, qualified, and motivated personnel who recognize the value of continuous improvement as one of the company's most important assets.

5. Determination and assessment of environmental aspects

At Telelink Business Services Group, the activities, requirements, and competencies for identifying and assessing environmental aspects are clearly defined, including the procedures and methods for determining their significance and impact.

There is an established Sustainability and ESG framework that encompasses various environmental aspects. The environmental risk assessment is a subset of the broader ESG risk assessment, and the present policy specifically pertains only to the environmental risk assessment.

The magnitude of the impact of environmental aspects in relation to the organization's activities are classified according to 3 (three) pre-defined significance groups:

- Low – very low impact on the environment with a low probability of occurrence;
- Moderate – the impact occurs under normal operating conditions with a predictable result. Disruption of the normal course of processes or working conditions would have little or short-term impact on the environment. The probability of occurrence is medium;
- High – the impact has significant environmental consequences due to its particularly large dimension. Abnormal conditions constitute a serious violation of regulatory requirements and warrant a complaint by staff and/or the public.

The identification, quantitative diagnosis, establishment of significance criteria and determination of the importance of environmental aspects takes place in 3 stages:

- Stage 1 - determination of all possible cases of impact on the environment for the given activity, process or area in normal, abnormal and emergency situations. This includes all indirect impacts on the part of the company's activities, subcontractors, suppliers, interested parties whose activities are controlled, according to Art. 15 of the Environmental Protection Act (Bulgarian legislation);
- Stage 2 – determining impact points. Environmental impacts are considered as an integral part of the process flow, therefore a causality analysis is performed.
- Stage 3 – assessing the compliance of environmental aspects with the defined requirements. Environmental impacts are considered in terms of environmental performance and the ability to prevent pollution using the plan-do-check-act method (Deming cycle).

5.1. Assessment of environmental aspects

Telelink Business Services Group evaluates environmental aspects once a year or when significant changes are made to the company's organization, processes, or operations.

The assessment is conducted following an established methodology, detailed in the appendix to this Policy, and the results are documented in the same appendix.

Environmental aspects are classified based on the evaluation of individual impacts, with the significance of each aspect determined by the highest-rated impact. The organization must manage environmental aspects rated as medium or high significance.

Any aspect subject to normative or legal requirements is automatically considered significant, regardless of the assessment results.

5.2. Determining the priorities for the management of environmental aspects

The following factors are taken into account when setting priorities in the management of environmental aspects:

- Degree of importance of the aspect
- Degree of non-compliance with normative and legal requirements;
- Degree of tolerance/intolerance of interested parties;
- Financial opportunities;
- Economic and technological possibilities for taking actions;
- Possibilities for taking temporary measures to limit the impact.

Environmental aspects, the management of which has been identified as a priority, are reflected in the annex to this policy in its part relating to the annual environmental management program.

Where management of specific aspects is not possible for technical, economic or other reasons, it will be:

- Postponed to a later stage;
- Monitored through certain operational control actions;
- Assessed and reviewed periodically when carrying out planned assessments of environmental aspects.

5.3. Program to achieve environmental management goals

Telelink Business Services Group develops and maintains a program to achieve environmental management goals. The development of this program includes the following stages:

- Determination of environmental aspects;
- Assessment of environmental aspects;
- Determining the significance of environmental aspects;
- Determining priorities in environmental management;
- Setting goals in environmental management;
- Determining the activities to achieve the set goals;
- Determination of responsibilities for the implementation of defined activities.

The results of this process are documented in the appendix to this policy or in other documents and materials as necessary.

6. Assessment of legal compliance and other requirements

Telelink Business Services Group ensures that all organizational processes comply with applicable regulatory and other requirements related to environmental management and protection. Current Bulgarian legal provisions are made accessible to the organization through specialized software, which the company's Legal Department team can access in accordance with their roles and responsibilities.

The established regulatory requirements, applicable to the organization's activities, related to the management and protection of the environment, are maintained in a register, part of the appendix to this policy.

When updating the register of applicable legislation, all changes in the legal and regulatory framework are confirmed with the Legal Department of Telelink Business Services Group and the necessary changes in the register are made by a team member of the Business Process Management Team.

The conformity assessment is carried out once a year or if necessary, in case of changes in the organization's activities, in the regulatory requirements or in other requirements related to the environment.

Other requirements regarding environmental management and protection may arise in connection with internal company processes, procedures and rules, company-defined objectives, contracts and other common documents with third parties, agreements with employees, agreements with other interested foreign and local authorities, good practices and principles.

7. Operational management of environmental aspects

At Telelink Business Services Group, the operational management process for environmental aspects has been established to regulate company activities and operations related to identified significant environmental aspects. All activities associated with these significant aspects are carried out in a manner that controls and minimizes harmful impacts while supporting the achievement of the company's goals, as detailed in the appendix to this policy.

7.1. Planning and control

Control is conducted with respect to specific environmental aspects, their assessment results, potential adverse environmental effects, applicable requirements, stakeholder expectations, and findings from previous audits and inspections.

If a potential violation of environmental management requirements is identified, one of the following actions may be taken:

- Gathering of a working group to examine and discuss the results of the control and, if necessary, propose changes in the environmental management program to the Executive Director of the company or other actions;
- Carrying out follow-up control to prevent repeated violations;

7.2. Monitoring and measurement

Telelink Business Services Group has clearly defined which activities associated with GHG (Greenhouse Gas) emissions are to be monitored and measured, ensuring a structured and consistent approach to tracking its environmental impact. The company has also established a methodology for data collection and calculation, detailed in a dedicated document known as the GHG Footprint Calculator. This methodology outlines the procedures, responsibilities, and data sources used to ensure accuracy and transparency in emissions reporting. Data is collected on a regular basis and is reviewed annually to assess performance, identify trends, and support continuous improvement in the organization's sustainability practices.

8. Actions in emergency situations

Telelink Business Services Group has identified and assessed potential hazards that could lead to environmental emergency situations. The identification of possible environmental emergencies and incidents is based on the evaluation of significant environmental aspects and their impacts and is conducted annually or in the event of exceptional changes.

The process considers and analyzes information on past hazards, accidents, incidents, and emergencies within the organization, as well as in other organizations with similar activities, infrastructure, or use of comparable technical equipment, fuels, and materials. It also takes into account the likelihood of emergencies or incidents occurring at neighboring facilities and sites, both regionally and nationally.

For the specific activities within the scope of Telelink Business Services, the company has identified the following potential emergency situations that could impact the environment:

- Spill of oil products - when using means of transport and when maintaining diesel generators;
- Fire - office premises and warehouse;
- Flooding – office premises and warehouse.

In the event of emergency situations that negatively affect the environment, they are recorded in the established register of adverse environmental impacts - included in the appendix to this policy - to ensure traceability, facilitate subsequent analysis, and enable appropriate corrective actions.

Change Control

Prepared / Updated current version

Revision	Date	Name, Surname, position
03	15-08-2025	Dilyana Peneva, Junior Risk and Compliance Expert

Change control

Revision	Date	Change description
01	18-09-2020	New document.
02	22-08-2023	Reflecting new ESG requirements.
03	15-08-2025	GHG footprint calculator

Current version

Approved by (Name, Surname, position)	Ivan Zhitiyanov, Chief Executive Director
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