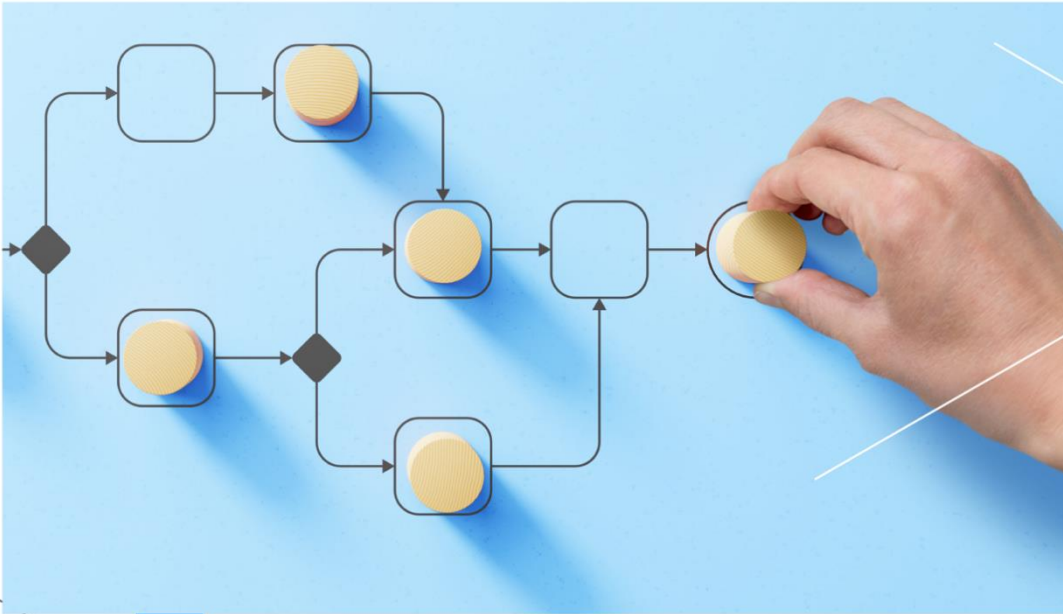




**telelink**  
**business**  
**services**



# **Environmental Management and Protection Policy**

## **Telelink Business Services Group**

## Table of Contents

1. Purpose of this document.....	3
2. Scope of application.....	3
3. Responsibilities.....	3
4. Environmental management and protection policy.....	3
4.1. Climate change.....	4
4.1.1. Climate change mitigation.....	4
4.1.2. Climate change adaptation.....	5
4.1.3. Energy efficiency and renewable energy.....	5
4.2. Pollution.....	6
4.3. Water and marine resources.....	7
4.4. Responsible use and circular economy.....	7
5. Determination and assessment of environmental aspects.....	8
5.1. Assessment of environmental aspects.....	9
5.2. Determining the priorities for the management of environmental aspects.....	9
5.3. Program to achieve environmental management goals.....	10
6. Assessment of legal compliance and other requirements.....	10
7. Operational management of environmental aspects.....	11
7.1. Planning and control.....	11
7.2. Monitoring and measurement.....	11
8. Actions in emergency situations.....	12
Change Control.....	13

## 1. Purpose of this document

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

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 as a result of the activities of service provision to our customers.

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

The commitment of Telelink Business Services Group extends to all activities and aspects that have the potential to affect the environment. The company complies with the following commitments:

- 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 in order to achieve continuous improvement of environmental performance;
- Knowledge of and strict compliance with 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;
- Focusing on building a positive culture in the performance of each activity and their purposeful continuous 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 in order to support and reach the global target to keep the 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 (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PCFs), sulphur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>) listed in Kyoto Protocol.

##### 4.1.1. Climate change mitigation

Climate change mitigation is one of the most important focus area 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**

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 and the office in Romania are located in BREEAM certified buildings. This certification gives guarantees for sustainably built environment.

- **Recycling of waste**

TBSG is committed to recycle 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 travels. 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 decrease the amount of GHG emissions generated from their commuting.

#### 4.1.2. Climate change adaptation

Climate change is already a fact, and it could be felt by all human beings. Climate adaptation is vitally important process for all countries, organizations, and human beings. As a company in technological sector, TBSG fully understands its role and responsibility in this process, and it supports organizationally and technologically countries and social communities in its areas of operation.

Adapting its new technological solutions, TBSG provides solution that support in flood prevention and accordingly prevents destruction and consequences for people and the state.

#### 4.1.3. Energy efficiency and renewable energy

Producing of energy could be one of the main sources of greenhouse gas emissions, that’s why organizations – these that produce energy and these that are using it, are responsible to find solutions to reduce the negative environmental impact.

There are two ways to complete this significant task:

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

TBSG supports the energy efficiency and because of this, The Company purchases latest generation electronic and electrical appliances. In order to save energy, where this is possible, automated control of air conditioning, ventilation and heating and smart lightening control system is applied.

## 4.2. Pollution

Industrialization, technological development, and mass consumption trends are factors that impact the local environment. Environmental pollution is not only reason for human health issues, but also problem causing loss of biodiversity and reducing of ecosystems possibilities to sequester and decontaminate the generated carbon emissions.

Pollution is problem not only for states, but also for companies and individuals. TBSG understands its responsibility to decrease pollution generated during operations and in the areas where it operates.

The Company is committed to the “zero pollution ambition” of the EU and it takes action in the three lines: air, water and soil pollution.

TBSG treats pollution reduction goal as goal for increasement of the equality in society. Vulnerable groups like children, older people and people with disabilities are the most impacted from negative effects of environmental pollution. Their health will be in risk till all responsible for the pollution actors don't take action.

The Company does periodical assessment of the possible negative impacts that it could bring to the environment and types of pollution are strictly controlled and managed.

In accordance with zero-pollution hierarchy, developed in EU Zero pollution action plan, The Company is acting against generation of the main types of waste, generated in its operations, as plastics, paper and electronic waste, generation of harmful emissions from vehicles.

On the first place is the preventing generation of all possible types of waste. TBSG employees are guided by the following principles:

- If it is not required a hard copy, documents should not be printed. All Corporate documents could be found in digitalized version on The Company Sharepoint portal.
- When it is possible, internal business meetings should be performed online.
- When it is possible business travels should be avoided and meeting with business partners to be performed online.
- TBSG is committed to provide technologic solutions which prevent or track environmental pollution.

- Internally, specialized companies should be used for maintenance of the company fleet and techniques, like printers, that could generate hazardous waste.

Because generation of all types of waste could not be stopped, the next steps applicable to TBSG 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 our source of life and at the same time only app. 3% of the water on Earth could be used as drinking water. Having these facts in mind all states, organizations and individuals should use this vitally important resource in the most responsible way.

As per UN SDG Report for 2022, 2 billion people are living in areas without good levels of drinking water services, including 1.2 billion people don't have even a basic level of service.

TBSG understands its responsibility and works to control and reduce its water footprint and to contribute for global positive impact. The Company is committed to decrease water consumption in its operations to the possible minimum. Where this is possible, water saving solutions are in place. In addition, TBSG is working with environmentally responsible suppliers, who take care about the water resources.

Water resources are important not only for people, but also for animals and plants. Oceans, seas, rivers, and wetlands are ecosystems that should be secured. Population growth and climate change could affect water-related ecosystems negatively, that's why TBSG is committed to operate in a way that will protect them and will 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 to live and work in the same way, as they are doing it now, resource consumption will be double, and the waste will be increased with more than 50%. These tendencies could be stopped, or at least to be slow down, only by circular economy.

Technology sector is one of the sectors that are using many types of raw materials. As part of the sector, TBSG understands its responsibility for responsible use of resources and is committed to implement the principles of 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.

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- 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 to buy 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 to throw out any product, first try to repair it.
- **Remanufacture/repurpose:** if the product, as a whole, could not be used anymore, it should be checked if there is any component that could be used in other product from the same type or its function to be changed.
- **Recycle:** all types of waste, generated in TBSG operations, that could be recycled must be recycled.

By following above principles, TBSG guarantees reduction of needs of usage of raw materials and reduction of generated waste.

In order to realize the current policy and the above commitments regarding environmental management and protection, Telelink Business Services Group relies on the implementation of effective and efficient processes, the development and assimilation of new technologies and trained and qualified personnel who are motivated and aware of the improvement of the team of the company as one of its most valuable assets.

## 5. Determination and assessment of environmental aspects

In Telelink Business Services, the activities, requirements, order and competences in the determination and assessment of environmental aspects are defined, including the order and methods for identification and determination of the degree of impact.

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 of environmental aspects is carried out according to an accepted methodology, part of the appendix to this Policy. The results of the assessment are documented in the same appendix.

Environmental aspects are classified according to the assessment of individual impacts – the degree of significance of the aspect is defined as equal to the significance of the impact assessed with the highest grade. The organization must manage the environmental aspects that are rated with medium and high significance.

In the presence of a normative and/or legal requirement regarding a certain aspect, it is accepted and identified as significant, regardless of the results of its assessment.

### **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 programme.

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;
- Are 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 the compliance of the processes in the organization with all regulatory and other applicable requirements regarding the management and protection of the environment. The current normative provisions of the Bulgarian legislation are accessible to the organization through the use of a specialized software product, which the team of the Legal Department of the company has access to according to their responsibilities and obligations.

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**

In Telelink Business Services Group, the process of operational management of environmental aspects has been defined, the purpose of which is to regulate the activities and operations of the company, which are related to the identified aspects / significant environmental aspects. All activities related to the significant environmental aspects are performed in a way that controls and reduces harmful impacts and supports the achievement of the company's defined goals described in the appendix to this policy.

### **7.1. Planning and control**

Control is carried out in relation to certain aspects of the environment and the results of their assessment, possible adverse effects on the environment, requirements, and specifics from interested parties, results of previous audits and inspections.

Upon establishing the likelihood of a violation of environmental management requirements, 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 defined key features of its activities that are related to environmental management.

When determining and evaluating environmental aspects, control indicators and the tool / method for their measurement are indicated.

Regarding the implementation of projects for the provision of services, specific parameters are tracked, which are individual for each contract and are determined according to the client's requirements.

An analysis of the key characteristics of the activities is done at least once a year during a management review and is documented in the minutes of the meeting.

## **8. Actions in emergency situations**

Telelink Business Services Group has identified and assessed the potential hazards that may cause emergency situations related to environmental management. The determination of possible emergency situations and incidents related to the environment is carried out on the basis of the determination and evaluation of the significant aspects of the environment and their impacts, and this is done once a year or in case of exceptional changes.

When implementing the process, information about dangers, accidents, incidents, and emergency situations that happened in the past in the organization, as well as in other organizations having a similar subject of activity, infrastructure or using similar technical means, fuels and materials, are taken into account and analyzed. The possibility of emergency situations and/or incidents occurring in neighboring facilities and sites, on a regional and national scale, is taken into account.

In relation with the specific activities included in the scope of activity of Telelink Business Services, the company has determined the following possible emergency situations that could affect 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 have an adverse impact on the environment, they are entered into the developed register of adverse environmental impacts - part of the appendix to this policy, for the purpose of traceability, subsequent analysis and taking action.

## Change Control

*Prepared / Updated current version*

Revision	Date	Name, Surname, position
02	22-08-2023	Marina Bogdanova, Risk and Compliance Expert

*Change control*

Revision	Date	Change description
01	18-09-2020	New document.
02	22-08-2023	Reflecting new ESG requirements.

*Current version*

<b>Approved by (Name, Surname, position)</b>	Ivan Zhitiyanov, Chief Executive Director
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