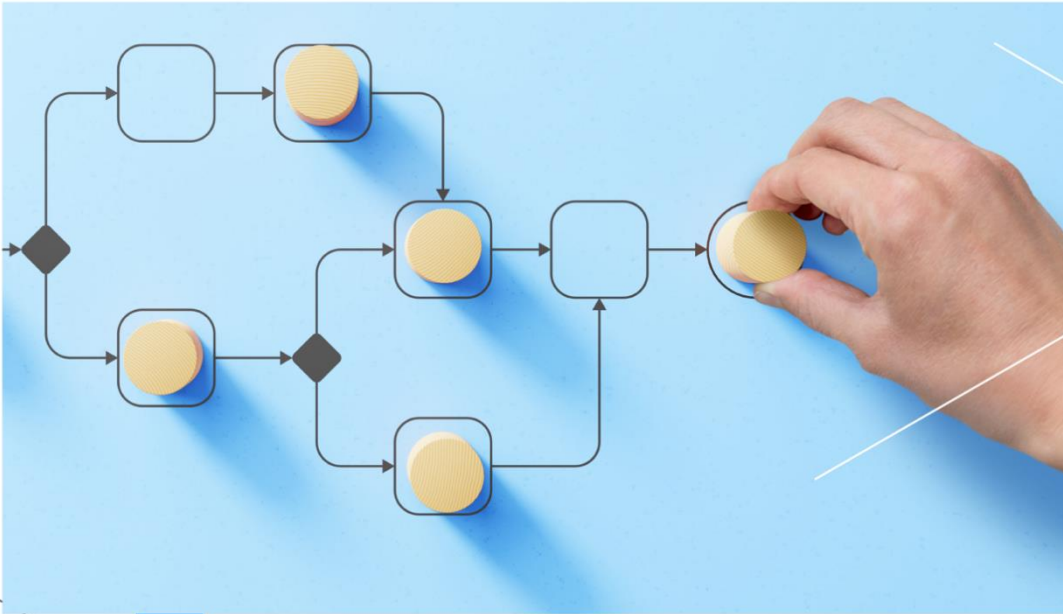




**telelink**  
**business**  
**services**



# Human Rights Policy

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## 1. Purpose

Telelink Business Services Group (for short: TBSG or The Company) is committed to protecting and promoting fundamental human rights in compliance with national and international regulations and principles.

The main purpose of this Policy is to ensure that TBSG is a socially responsible company, committed to respect and promote human rights, not only within the organization, but also in the entire value chain.

## 2. Scope

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.

The Policy also applies to all third-party service providers. Partners, suppliers, distributors and customers shall respect and promote human rights, as well as to comply with all applicable legal regulations and standards.

TBSG Human Rights Policy supports the human rights of all TBSG stakeholders.

## 3. Definitions

### Human rights

Rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination. ([www.undp.org](http://www.undp.org)).

### Discrimination

Any unfair treatment or arbitrary distinction based on a person's race, sex, gender identity, religion, nationality, ethnic origin, sexual orientation, disability, pregnancy, age, language, social origin or other status. Discrimination may be an isolated event affecting one person or a group of persons similarly situated or may manifest itself through harassment or abuse of authority. ([www.undp.org](http://www.undp.org)).

### Harassment

Any improper and unwelcome conduct that might reasonably be expected or be perceived to cause offence or humiliation to another person. Harassment may take the form of words, gestures or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass another or which create an intimidating, hostile or offensive work environment. Harassment normally implies a series of incidents. Disagreement on work performance or on other work-

related issues is normally not considered harassment and is not dealt with under the provisions of this policy but in the context of performance management. ([www.un.org](http://www.un.org))

### **Child labor**

Work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. This includes work that is mentally, physically, socially or morally dangerous and harmful to children; work that interferes with their schooling; and engaging in work children who are under the minimum working age(s) set by national legislation or international standards. No child under 18 years old should be engaged in hazardous work (i.e. work that is likely to harm their health, safety or morals) or other worst forms of child labour such as trafficking, sexual exploitation, debt bondage, forced labour and the recruitment or use of underage children for security or military purposes. (The Children's Rights and Business Principles).

## **4. Policy and principles on human rights**

Telelink Business Services Group (TBSG) fully recognizes its responsibilities to respect and promote human rights. TBSG respects dignity and worth of all employees and stimulates them to develop to their full potential by providing them with equal opportunities, without any discriminatory practices.

To guarantee the protection of human rights, TBSG is acting in compliance with national and international legal regulations, standards, and principles. If national legislation differs with international regulations, TBSG will follow the higher standard. In case there is a conflict between them, TBSG will follow national laws and will try to respect international human rights to the greatest extent possible.

The main international guidelines that TBSG follows are:

- UN Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- United Nations Guiding Principles on Business and Human Rights
- UN Women's Empowerment Principles
- The Children's Rights and Business Principles
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work

In compliance with UN Universal Declaration of Human Rights, The International Covenant on Civil and Political Rights, The International Covenant on Economic, Social and Cultural Rights and ILO Declaration on Fundamental Principles and Rights at Work, TBSG is committed to treat all human beings equally in dignity and rights.

The Company does not tolerate any kind of discrimination and harassment practices on the base of race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status. Harassment will not be accepted in the workplace and in any work-related circumstance outside the workplace.

Respecting the fundamental rights of each human being of life, liberty, and security of person, TBSG is committed to ensure work environment free of violence, intimidation and other unsafe or disruptive conditions. In the process of providing security measures for all employees, the Company follows principles for employee privacy and dignity.

The Company is committed to respect the right of each person to work and to have free choice of employment. Fundamental criteria in recruitment and hiring process in TBSG are qualification, skills, and experience. TBSG is providing equal opportunities to all its employees for development and trainings, as well as fair and transparent remuneration. The Company works in compliance with applicable wage, work hours, overtime and benefits legal regulations.

All employment contracts concluded by the Company shall be provided in advance to the respective employee, indicating the terms and conditions of employment, the voluntary nature of employment, the freedom to leave and any consequences that may be related to departure or termination of employment.

TBSG is working strongly against slavery, the slave trade, any form of human trafficking as well as all forms of forced or compulsory labor.

TBSG respects and observes the legal right of employees to communicate freely, as well as their legal right to associate, form or join a trade union or otherwise participate in collective bargaining.

Freedom of association implies respect for the right of all workers to form and join groups to promote and protect their professional interests freely and voluntarily.

The company does not interfere in the decision of the workers to associate, nor does it try to influence in any way their decision or discriminate against the workers who choose to associate or those who act as their representatives.

Taking in consideration the 10 principles in The Children's Rights and Business Principles, in TBSG is prohibited hiring of individuals that are under 18 years of age for positions, where hazardous work is required.

As a socially responsible company, Telelink Business Services Group realizes that child labor can harm the physical, social, mental, psychological, and spiritual development of the child, depriving him of a normal opportunity to receive adequate education and qualifications. Therefore, the company applies a strict policy for non-employment of children under 16 years of age.

In certain cases, and in full compliance with all applicable regulatory requirements for child labor, the company hires only employees who meet the applicable minimum age requirements in the countries where it operates. In these cases, the offered positions are fully consistent with the age, education and skills of the individuals and include the opportunity to effectively upgrade their knowledge and improve the qualifications to which they aspire.

In order to apply of the principle for prevention of illegal use of child labor, the Company also applies the following additional measures:

- Carrying out a strict check of the person's age and obtaining the explicit written consent of the parents when the law allows his employment under certain conditions.
- Preventing children under the legal age from performing any work activity.
- Introducing an obligation for the subcontractors with whom TBSG works to apply the above-mentioned measures for prevention of child labor.

Following UN Women's Empowerment Principles, and its Equality, Diversity and Inclusion Policy, TBSG treats its employees equally, no matter if they are women or men.

TBSG is providing equal opportunities for development of women, and they actively take part in senior management teams at TBSG. In addition, remuneration based on performance and experience, access to trainings, healthy work environment and personal healthcare are assured to all employees in the Company.

### **Human rights in value chain**

TBSG is working to increase its positive impact on respecting and promoting human rights in its value chain, acting as a role model and by doing business in fair and transparent manner with all its business associates.

TBSG is committed to respect and strengthen human rights in its value chain, and it expects from its partners, suppliers, distributors, customers:

- To recognize their responsibility to respect and promote human rights;
- To be compliant with national and international legal regulations and principles;
- To follow international labor standards;
- To commit that they will not use forced and child labor.

The company assures that with Supplier Code of Conduct, which is valid for partners, suppliers, distributors and with the due diligence process.

TBSG Sustainability approach guarantees that the Company is doing business only with sustainable and socially responsible business partners. Together with our Supplier Code of Conduct, our partners are asked to pass ESG assessment, which gives the possibility to TBSG to

understand its business partners commitment to respect the human rights, not only of their employees but also of social groups in countries where they operate.

### **TBSG due diligence process**

In compliance with the UN Guiding Principles, TBSG is performing regular human rights risk assessments in order to integrate the prevention and mitigation measures into its policies and processes and to minimize the negative impact if such occurs.

TBSG has implemented policies and processes necessary to assure respect and promotion of human rights internally and externally.

The Company understands that due diligence is an ongoing process that requires attention to details like kind of the provided goods and services or the country of operation. TBSG is continuous collaboration with its internal and external stakeholders, who could be affected by its actions.

## Change Control

*Prepared / Updated current version*

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*Change control*

Revision	Date	Change description
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*Current version*

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