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NOTION FOR INNOVATION, CREATIVITY & KNOWLEDGE

Anti-corruption and Bribery

Code of Conduct

This Policy is applicable to every employee of NICK 2000 Ltd. The reporting requirement of this Policy is also applicable NICK 2000 Ltd's contractors and suppliers. NICK 2000 Ltd. Is committed to conducting business in accordance with all applicable laws, rules and regulations in Bulgaria and the highest ethical standards. NICK 2000 Ltd. have adopted a policy for the prevention of corruption and bribery in our business dealings: • Adopted a clear policy of compliance with the law against any form of corruption and bribery in its business and emphasized its support for employees whose business actions actively enforce this policy.

- Endorsed this „Code of Conduct“.
- Put in place a set of comprehensive management procedures dealing with all aspects of preventing and discovering corruption and bribery.
- Enforced monitoring and auditing the effectiveness of the Company's approach which will be kept under review. Personal Responsibility. As an Employee of NICK 2000 Ltd. it is our personal responsibility to actively work to prevent corruption and bribery in our business. This means:
 - We promise, not to offer or give a bribe which could be in the form of hospitality or a gift intending to induce the recipient into improper conduct, such as favoring our company.
 - We don't request, accept or agree to receive a bribe (payment or other advantage) in return for some preferential treatment.
 - Actively try to prevent corruption and bribery; so apart from not doing certain acts we work to uncover corruption and report incidents or concerns.
 - We don't conceal or be a party to concealing any improper conduct. Breach of the above would amount to a criminal offence and be treated as „Gross Misconduct“. Where we have responsibility for Staff (Line Manager) or as Head of a business unit it is also our responsibility to ensure that:
 - Our staff is aware of the corporate policy, Code of Conduct and the stance that the Company has taken.
 - We implement the Procedures that have been adopted and apply them to the conduct of our business.
 - Our Partners, contractors and service providers are aware of our policy and procedures.

Signature: Danail Dechev

