ANTI-CORRUPTION POLICY

1. Policy objective

The purpose of this policy is to ensure compliance with all applicable anti-bribery and anti-corruption regulations, and to ensure that the Company's business activities are carried out in a socially responsible manner.

1.1. This anti-corruption policy is designed to set out the responsibilities of Prista Oil and those who work for it in relation to complying with and maintaining its zero tolerance position on bribery and corruption.

1.2. The policy has also been prepared to serve as a source of information and guidance for those working for Prista Oil. It helps them to recognise and deal with bribery and corruption issues and to understand their responsibilities;

1.3. The company's goal is to strive for zero corrupt practices. This goal is achieved and evaluated annually through an annual report to the company's management, which measures the quantitative and, where possible, qualitative implementation of this policy.

1.4. It is the Company's goal to continually review and update the clauses addressed in this document and to keep the staff informed of changes in a timely manner. This will be achieved through annual training within the organisation.

2. Policy statement

2.1. Prista Oil is committed to conducting business in an ethical and honest manner, using best practices in this regard to ensure that bribery and malpractice are prevented. The Company has a zero tolerance approach to bribery and corrupt activities. It is committed to acting professionally,

honestly and with integrity in all business dealings and relationships, regardless of the country in which it operates.

2.2. Prista Oil complies with all legal and moral requirements related to the fight against bribery and corruption in all jurisdictions in which it operates.

2.3. If a company is found to have engaged in corrupt activities, it could be subject to an unlimited fine, debarment from tendering for public contracts and serious reputational damage. We are therefore committed to preventing bribery and corruption and take our legal responsibilities very seriously.

3. Policy scope

3.1. The policy applies to all employees /whether on temporary, fixed-term and/or permanent contracts/, consultants, contractors, trainees, agency staff, agents, sponsors or any other persons associated with the company /including third parties/, or with all subsidiaries and their employees, regardless of their location. The policy also applies to senior managers, employees and members of the Board at any level.

3.2. In the context of this policy, a third party refers to any person or organisation with whom the company meets and works. It refers to actual and potential customers, consumers, suppliers, distributors, business contacts, agents, advisors and government and public bodies including their advisors, representatives and officials, politicians and political parties.

4. Terms used in this policy

4.1. Bribery - offering, promising or giving anything of value to improperly influence another person for the purpose of obtaining employment with Prista Oil or providing an advantage. These may include money, gifts, hospitality, expenses, reciprocal favors, political or charitable contributions, or any direct or indirect benefit or consideration.

4.2. Corruption - describes any dishonest behaviour. This can include giving or receiving bribes or benefits, but also acting fraudulently or acting

in a way that puts your interests in conflict with those of Prista Oil while you are in an employment/service or business relationship.

4.3. Employees - persons who are in an employment relationship with the company.

4.4. Facilitation payments - payments that are requested by government officials to expedite routine government actions such as:

- ✓ processing licenses, permits, or other official documents;
- ✓ processing government documents, such as visas and work orders;
- ✓ providing services such as police protection.

4.5. Officials - persons of any government institution or agency, employees of any public organization, political party and party leaders, candidates for public office, officers and employees of government-owned or government-controlled companies, any person acting on behalf of any of these officials, a person holding a legislative, administrative or judicial position.

4.6. Third Party/Parties - includes agents, brokers, partners, consultants, contractors and other representatives performing services for the benefit of Prista Oil.

Taking and giving a bribe is a **CRIME**! Employees must not only not engage in any form of bribery, whether directly or through a third party, but upon becoming aware of such practice, immediately notify the appropriate authorities. They should not accept bribes to any extent and if they are unsure whether something is a bribe, gift or act of hospitality, they should seek further advice from legal counsel and/or the Executive Director.

5. Fight against bribery and corruption

Prista Oil (acting through its employees and third parties) DECLARES that it will not pay or receive bribes, directly or indirectly. There is no established monetary threshold that defines bribery, and bribery need not be successful to be perceived as corruption, as the offer of it is sufficient for a crime to occur.

Prista Oil will not tolerate its employees and/or third parties being involved in any level of corruption or bribery. All reported cases of actual or suspected corruption or bribery will be promptly and thoroughly investigated and resolved in the manner required by law.

Prista Oil, its employees, officers and third parties shall not, directly or indirectly, offer, accept, promise, pay or authorize a bribe to an official with the intent to influence the official in his or her official capacity, whether or not this constitutes a criminal offense for the official accepting the bribe.

Employees of Prista Oil are required to notify the Executive Director if they suspect that an instance of bribery or corruption has occurred or will occur in the future that violates this policy.

6. Due diligence and third parties

Prista Oil cannot be held liable for "indirect" payments made or offered to a business or person on its behalf by a third party until the facts and circumstances of the case have been established. When dealing with a third party, it is essential to carry out appropriate due diligence on the reputation of the third party and to understand any bribery and corruption risks that may exist.

Prista Oil believes that the following areas require more specific due diligence and risk assessment before entering into any business relationship, transaction or project (for the avoidance of doubt, third parties, joint ventures or company acquisitions are included):

- ✓ risk assessment relating to fraud, bribery, and corruption in the country where the business is to be conducted;
- ✓ a review of the potential business partners of the third country;
- ✓ review of the proposed project or business transaction to identify, to the extent possible, the risk of corruption or bribery.

When working with third parties, instances that should be considered as indicators of potential violations of anti-bribery or anti-corruption laws include:

- ✓ foreign official recommends that Prista Oil hire a particular third party;
- ✓ the proposed compensation of a third party hired by Prista Oil is unreasonably high compared to market value without reasonable explanation;

In the event that such potential risks are identified, their existence must be immediately communicated to the Legal Counsel and the CEO who will decide what action should be taken.

7. Payment of expenses, hospitality, and business entertainment

Payment of expenses, hospitality and business entertainment on behalf of foreign officials must not be made without prior authorization from the Executive Director , who will determine whether or not the proposed payment is allowable under applicable law.

8. Facilitation payments and rush payments

Prista Oil does not accept and will not make any facilitation payments of any nature. If you have any questions or concerns about whether or not to make a payment that may constitute a Facilitation Payment, you should contact legal counsel and the Executive Director for advice.

9.Political donations

All political and charitable contributions, whether made directly or indirectly, must comply with applicable laws, must be publicly disclosable and must not be made to unduly influence the recipient or in return for any business advantage.

Prista Oil accepts (and indeed encourages) the act of giving to charities - whether through services, knowledge, time or direct financial contributions (monetary or otherwise) - and agrees to disclose all charitable contributions made by the company.

Employees must take steps to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

The Company shall ensure that all charitable contributions made are legal and ethical, in accordance with local laws and practices, and that donations are not offered/made without the approval of the CEO.

9. Employee responsibilities

9.1. As an employee of Prista Oil you must ensure that you read, understand and comply with the information contained in this policy and any training or other anti-bribery and anti-corruption information that is made available to you;

9.2. All employees and those under the control of the Company are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to a breach of this anti-bribery policy.

10. Penalties, enforcement, and disciplinary action for failure to comply with this policy

Prista Oil treats corruption and bribery very responsibly. Following appropriate investigation, the Company will take legal and/or disciplinary action in all cases where deemed appropriate. Violation of this policy may result, in a review and revision of the business relationship, legal action or disciplinary action in accordance with Prista Oil's procedures, and disciplinary action leading to termination of employment.

Disciplinary action may also be taken in cases of unreported known violation of this policy.

Appropriate action will also be taken against contractors involved in any violation of this policy, including with respect to contracts entered into with such parties. This may result in the termination of a contract with a third party.

11. Breach management process

All employees are encouraged to raise any genuine concerns about suspected misconduct or abuse, including bribery, facilitation payments, extortion and money laundering, tax evasion, ethical breaches or any perceived violation of their rights. Known violations of this policy must be reported.

Prista Oil will not tolerate any form of retaliation against any person who raises a concern in good faith. If a person reports a concern in good faith and seeks advice, they will always be supported by the Company.

12. Training and communication

12.1. Prista Oil requires that, on appointment, all employees are made aware of this policy to ensure that they are aware of the types of corruption and bribery, the risks of engaging in corrupt activity and bribery, and how they can report suspected corruption and bribery. Employees will also receive annual, appropriate training on how to adhere to this policy.

12.2. Prista Oil's anti-bribery and anti-corruption policy, and zero tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and third parties at the outset of the business relationship and as appropriate thereafter.

13. Record keeping

Prista Oil will maintain detailed and accurate financial records and have appropriate internal controls in place to act as evidence of all payments made. All payments and other financial transactions must be authorized by management. No undisclosed or unrecorded funds may be made, for any purpose.

Upon receipt of a report, a committee of jurisdiction shall be formed within a reasonable time to review the report and, if necessary, refer it to the appropriate government authorities. In each case, a report shall be made to the management of the company.

14. Monitoring and review

14.1. The CEO of Prista Oil is responsible for monitoring the effectiveness of this policy and will, at his discretion, regularly review its implementation, taking into account its suitability, adequacy, and effectiveness.

14.2 Prista Oil will review and amend this policy in the event of any changes in applicable law.

14.3. This policy does not form part of any employee's contract of employment and may be amended at any time to improve its effectiveness in combating bribery and corruption.

If you have any questions, would like further information or wish to report any circumstances that are in breach of this policy, you may do so by e-mail to: bkp@prista-oil.bg, and at 46 Treti mart Blvd., in person at the location and/or by mail/courier in a sealed, opaque envelope addressed to the Whistleblower Officer.

Ruse **Executive Director: Tsvetomir Anastasov**

Date: 31.01.2024