



Bulgaria, UNIQA Insurance plc

Bulgaria, UNIQA Life Insurance plc

UBG Code of Conduct

Level 3 Document

“The governing language shall be English. The Bulgarian version is a working translation for convenience purposes only, and in case of any discrepancies, the English version shall prevail.”

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1 Definitions

“Appendix”	means any Appendix to this document.
“Branch”	means a further office of a Business Unit belonging to UNIQA Group that participates autonomous in business transactions but does not constitute a separate legal Business Unit.
“Business Unit”	means any legal Business Unit of UNIQA BG.
“Change Log”	means a record including all changes made to a regulation compared to the previous version of such regulation.
“Compliance“	means acting in accordance with the valid laws and regulatory requirements and valid inter and intra Group valid manuals of all UNIQA business areas.
“D-Regulation”	means Commission Delegated Regulation (EU) 2015/35 of 10 October 2014 supplementing Solvency II.
“Effective Date”	means the date on which this Level 3 document enters into force.
“External benefit”	<p>means a) granting of cash benefits or benefits in kind to external third parties as well as b) accepting of cash benefits or benefits in kind from external third parties.</p> <p>Benefits that involve UNIQA internal and UNIQA external persons need to be treated as External benefits as well.</p> <p>Clarification: General agents are to be treated as external third parties.</p>
“Group Compliance Policy”	means the Group Compliance Policy which is the basis for this Level 3 Document.
“Group Compliance Standard”	means the Group Compliance Standard which is the basis for this Level 3 Document.
„UBG Policy-Management Standard”	means the UNIQA Bulgaria Policy-Management Standard.
“(Re)Insurance Business Unit”	means a Business Unit of UNIQA Group, which holds a license for being active in any line(s) of (re)insurance business.
“Internal benefit”	means granting and receiving of benefits in kind solely by persons within UNIQA BG (meaning the exclusive involvement of UNIQA staff or Board members).
“Know-Your-Customer“	means an effort to verify the identity, suitability and risks involved with maintaining a business relationship.
“Level 1 Document” or „Policy”	is defined in the Governance Policy.
“Level 2 Document” or „Standard”	is defined in the Governance Policy.
“Level 3 Document” or „Other Regulation”	is defined in the Governance Policy.
“Compliance-Function“	is defined in Section 4.1. (General) of the Compliance Policy.
“Non-(Re)Insurance Business Unit”	means a Business Unit of UNIQA Group which does not conduct insurance business and in which a Business Unit of UNIQA Group holds more than 50%.

“Solvency II”	means the DIRECTIVE 2009/138/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 November 2009 (Solvency II).
„UBG“	means UNIQA Bulgaria which includes UNIQA Insurance plc and UNIQA Life Insurance plc.
„UNIQA“	means UNIQA Bulgaria which includes UNIQA Insurance plc and UNIQA Life Insurance plc.
„UBG Compliance Policy”	means the Compliance Policy of UNIQA BG which is the basis for this Level 3 Document.
„UBG Compliance Standard”	means the Compliance Standard of UNIQA BG which is the basis for this Level 3 Document.
„UBG Policy-Management Standard“	means the Policy-Management Standard of UNIQA Österreich Versicherungen AG.
“UIG“	means UNIQA Insurance Group AG.
“UNIQA Code of Conduct”	means this Level 3 document.
“UNIQA Group“	means UIG and its subsidiaries together.
“Whistleblowing Platform“	means a system to detect weaknesses of considerable extent and incidences of general interest that have a legal or moral impact. Incidences are reported anonymously.

2 Introduction

2.1 Aims, Legal Basis and Review

2.1.1 Aims

The UNIQA Code of Conduct plays the important part to rule the responsibility and behavior towards our colleagues, business partners and our clients. Furthermore, it gives direction in situations in which it is not fully clear how to behave and it shall protect the reputation of the UNIQA brand.

2.1.2 Legal Basis

The legal basis of this UNIQA Code of Conduct is Article 46 of Solvency II and Article 270 of D-Regulation.

2.1.3 Review

This document shall be reviewed once per year by the authors, as required to reflect amendments of its legal basis (if any) and other relevant developments in UNIQA Bulgaria, as the case may be.

2.2 Scope

2.2.1 Hierarchical Level

This UNIQA Code of Conduct is a Level 3 Document (Other Regulation).

2.2.2 Scope of Application

The (Re)Insurance Business Units, Branches and Non-(Re)Insurance Business Units of UBG, which are listed in Appendix ./1, shall implement the UNIQA Code of Conduct Group to the full extent.

The implementation process is described in the UBG Policy-Management Standard.

2.2.3 Enacting Body

The UNIQA Code of Conduct is enacted by the Management Board of UBG.

2.2.4 Link and Context to other Regulations

This Level 3 Document (Other Regulation) is supplementing the UBG Compliance Policy and the UBG Compliance Standard.

This document contains references to the UBG Policy-Management Standard.

2.2.5 Effective Date

This UNIQA Code of Conduct enters into force on March 17, 2021.

2.2.6 Governing Language

This UNIQA Code of Conduct is created in English and Bulgarian. The governing language shall be English. The Bulgarian version is a working translation for convenience purposes only, and in case of any discrepancies, the English version shall prevail.

3 Code of Conduct

3.1 Foreword

Dear employees,

Due to our strong brand UNIQA we are among the most successful insurers on the market in Bulgaria, Austria, as well as in Central and Eastern Europe. UNIQA's most important task is to provide security to our clients and to support them in designing their future in the best possible way. This social responsibility we would like to take on accordingly.

Our work as insurer is based to the highest degree on trust. Therefore, diligent and lawful behaviour is a given prerequisite for our sustainable success and has an essential influence on our company's reputation.

On this basis, we have created our Code of Conduct. It reflects our Guiding Principles and our corporate culture. Consequently, the Code of Conduct provides the necessary framework for our daily behaviour towards our clients, business partners and employees.

Our Code of Conduct is in many respects more precise than the legal obligations. Thus, we set clear and trend-setting standards for a modern and ethically exemplary behaviour. The Code of Conduct protects us, all UBG employees, UNIQA Bulgaria and UNIQA Group itself, against potential fines/legal consequences, the loss of client confidence and the loss of reputation.

The entire Management Board supports the Code of Conduct unconditionally. Hence, it applies equally to us as well as to all employees in UNIQA Bulgaria, including the Supervisory Board. In the sense of personal responsibility, everyone is personally accountable for the own actions and contributes therefore actively to the sustainable reputation of UNIQA.

Let us continue together our successful way in accordance with this Code of Conduct.

All regulations of this Code of Conduct were enacted by the Management Boards of UNIQA Insurance plc and UNIQA Life Insurance plc and shall apply from 17 March 2021.

Sofia, March 2021

Boris Palichev
General Manager and Member of the Management Board
UNIQA Insurance plc and UNIQA Life Insurance plc

Dimitar Tonev
Member of the Management Board

UNIQA Insurance plc and UNIQA Life Insurance plc

Nikolai Genchev

Member of the Management Board

UNIQA Insurance plc and UNIQA Life Insurance plc

Georgi Georgiev

Member of the Management Board

UNIQA Life Insurance plc

3.2 Guiding Principles

1. Customer First

In our processes, products and services, we always put the customer in the center of everything we do. We organize ourselves and report along the retail, bank and corporate & affinity customer segments. We focus on the needs and demands of our customers and ask them for their opinion. The customer feedback in a 5-star rating shows us whether we live up to this principle.

2. Responsibility

Our employees act competently and independently; this is the only way they can support our customers quickly and accompany them in a good way. We all take corporate responsibility and look for the best and fastest solution for our customers. We act neither bureaucratically nor politically, but entrepreneurially and customer-centered. We make decisions and also give our colleagues this space. In our actions, we are increasingly taking over more responsibility for our neighbors and society (sustainability).

3. Community

We are a diverse community of over 15 million people in 18 countries. The power of this community is the source of our achievements and the inspiration of our work, which should enable the people in our community to have a better life. We support each other beyond defined responsibilities in order to serve our customers in the best way possible. We are committed to continuously improve our collaboration. We live diversity - intolerance and exclusion have no place.

4. Simplicity

In an increasingly complex world, it is our goal to offer our customers easily understandable and useful services and products that offer tangible added value for their lives. We put the benefits of simple solutions above those of "best in class" solutions. In our collaboration, we prefer the personal conversation to the written message and reduce the addressee group to those recipients from whom an action is expected. We always respond promptly and to the point.

5. Integrity

A community is only as strong as the trust it is built on. That is why we stand by our values and guidelines in all our actions, live transparent communication and do everything we can to keep our promises.

3.3 Ethical management and legal compliance

We care and work hard for our clients and colleagues. We know and understand their needs and we inspire them. As members of the staff we motivate and support our colleagues. We are proactive and set industry standards by introducing intelligent, new solutions. Our attitude within the company and towards third parties is honest and explicit. We provide our services reliably as we value our clients and colleagues. We keep our promises. What we have in common as employees of UNIQA is that we want to be in the lead. We are successful because we deliver top services to our clients which are better than those of our competitors.

With this attitude we commit to our clients so that they can design their lives with confidence and joy. We want to achieve our goals in order to be the leading insurance company in the heart of Europe. Although we are a European insurance group, local presence is of great importance to us.

On this basis we set internal standards for ethical behaviour which partially exceed applicable laws. We use the freedom of discretion only to the extent that it is in line with legislation as well as with our values and as long as it does not harm the reputation of UNIQA.

If perceived in connection with UNIQA, also our private behaviour has to correspond with legal and social standards. Actions which may damage the reputation of UNIQA are not acceptable. It is important to us to work with business partners who also act in compliance with the law and whose moral and ethical standards are on a similar level.

The behaviour of colleagues in leading positions serves as role model for employees and the entire UNIQA Bulgaria and UNIQA Group. These colleagues have to ensure that their employees are familiar with the Code of Conduct and that they comply with the implied principles of behaviour.

In our working environment we do not allow anybody to get involved in illegal activities nor do we tolerate unlawful actions. This applies to all countries in which UNIQA has business activities. In this context, we pay particular attention to the following topics:

Prevention of corruption

Corruption includes demanding, offering or accepting a dishonest advantage (mostly referred to as bribery, bribe money or benefit).

Certain kinds of immoral behaviour are difficult to capture by law so that it is not always obvious whether a behaviour is actually illegal. Therefore, every one of us needs to make sure to refrain at all times from corruption and "grey areas" and to report related incidents as well as well-founded suspicions to the responsible supervisor and to the Compliance Function. It is one of our most important tasks to protect the company's reputation.

Anti-money laundering

UNIQA takes all measures required by law to prevent money laundering and terrorist financing. According to this, we follow the "Know-Your-Customer" principle which effectively prevents anonymous transactions.

Information / Reports / Whistleblowing

If we become aware of a violation of laws or of ongoing violations of the Code of Conduct, we inform our supervisor and the Compliance-Function. The notification may be provided by phone, e-mail, letter or via the Whistleblowing Platform which was created especially for this purpose. All notifications may be given either personally or anonymously. Notifications are treated confidentially and verified with due care.

Consequences in case of violations

Violation of legal regulations and generally accepted ethical rules may result in a lasting damage to UNIQA. Amongst other things, this might lead to claims for damages, administrative and corporate penalties or to the revocation of permits and licences.

UNIQA reacts without exception to every violation. It is up to the company's discretion to determine enforcing measures which might also lead to the termination of employment or claims for damages.

3.4 Etiquette

The straight-forward way of dealing with people on a trustful basis is closely linked to our business model. Therefore, the right way of dealing with clients and partners as well as with colleagues is very important to us. The way how people interact with each other creates an image of the company which is clearly visible inwards and outwards.

A polite and respectful tone is a prerequisite, both in conversations among employees as well as with clients and partners. We avoid degradation of any kind. Both internally and externally, we tolerate no discrimination whatsoever on grounds of ethnic origin, race, sex, religion, ideology, disability, age or sexual orientation.

Respectful, straight-forward, collaborative and reliable behaviour is part of our attitude when interacting with clients, partners, public authorities, colleagues, employees, supervisors and others.

Interaction with clients

We handle transactions in a correct, competent, friendly and timely manner.

We meet our clients on a basis of trust. The focus of our daily work is to create solutions for our clients and to reinforce our trustworthiness.

We provide best possible advice to our clients. regarding long-term, asset-creating personal protection policies we are in particular aware of our responsibility and advise our clients with utmost care in order to meet their long-term needs.

Despite acting with integrity and sense of responsibility, clients or partners may feel that they are not treated in the best possible way. To live up to our fundamental principles we have established a request and complaint management system especially designed for that purpose.

We handle complaints from present or former clients and partners reliably, friendly, competently and promptly in accordance with applicable laws and regulations. Client orientation is the key to our success.

All our work-related acting and thinking is focused on the clients.

Our clients expect security from us. We provide support in cases of emergency and act in a thoughtful and helpful manner. Prevention of dangers begins with noticing problems. Instead of looking away, tackle the issue! Also, in internal processes the main focus is on service and we support our internal clients and colleagues in the best way possible.

Employees who are in permanent or occasional contact with clients and business partners pay particularly attention to their appearance. However, also all other employees are requested to dress according to their function.

Good to know:

Question: A client calls and expresses his anger about the fact that he is asked to provide identification before his life insurance is paid out to him. This is required by law. Do I still have to continue the communication with the client who does not recognize the legal obligation?

Answer: Yes. The client must be informed about the statutory requirements in a friendly and patient manner, even if it is time-consuming for us.

Good to know:

Question: I work for UNIQA and enter one of our registration offices to register my new car. In the presence of clients two employees have a loud argument. What do I do?

Answer: I advise my two colleagues in a polite but determined manner not to settle internal issues in the customer area.

Interaction with business partners / public authorities

The relationships with our business partners are the key to success and must be the product of our principles, mutual satisfaction and cooperative collaboration. We all benefit from a long-term and sustainable business relationship.

Our relationships with public authorities are characterized by straight-forward, team-oriented and reliable cooperation. We maintain open communication channels with all authorities at international, national and local levels. Communication with regulatory authorities is to be carried out exclusively by the relevant Management Board Member or the employees explicitly assigned and authorised by the Management Board.

Interaction with employees

We are aware of our social responsibility and comply therefore with employment protection, legislation of labour contracts and the rights of employees' representatives.

Performance at work, capability, commitment and motivation alone are the material and decisive criteria for career and personal development.

3.5 Benefits

Benefits and reporting obligations

The giving of courtesies to business partners or customers enjoys a long tradition in business practice. Nevertheless, a benefit must never be misused for the purpose of gaining a dishonest or unfair advantage for oneself or others or for exerting influence. Furthermore, the reputation and integrity of the UNIQA Bulgaria must never be damaged by benefits of any kind. That is why this topic requires special attention.

Gifts and invitations

In general, we consider small gifts among external business partners as an expression of mutual appreciation, which supports the establishment and maintenance of long-term business relationships. However, the value of gifts must be reasonable. This is the case if there is no possibility of being influenced by the amount or type of the gift. Any appearance of dishonesty or incorrectness must be avoided.

The Compliance-Function must be consulted in advance regarding important matters or in cases of doubt.

We surrender gifts with a value of 100 EUR or more and gifts for which the rejection of the gift appears inappropriate (as usual, the circumstances of the individual case must be considered) to the Compliance-Function.

As a basic principle, accepting as well as granting direct or indirect financial benefits is prohibited.

All invitations to events such as evening events, theatre performances, balls, conferences, sports events, etc. are evaluated on an individual basis while also taking the position and function of the invited employee into account.

When an invitation is extended, then we take care that there is always a UNIQA Bulgaria employee present at the time when the invitation takes place such as when the invitation is for attending an event.

We make a distinction between invitations which are directed to a general group of people and invitations which are directed to individuals only.

We always consider all circumstances of each individual case and maintain a healthy sense of proportion when accepting or granting gifts and invitations. Gifts and invitations need to be directed to the company address. In cases of doubt we consult the Compliance-Function.

Good to know:

Question: I am a project manager at UNIQA and I am looking for a new IT system. The potential partner would like to invite me as a representative of UNIQA to a business dinner. May I accept the invitation?

Answer: Under the condition that business issues are discussed during the dinner and that a representative of UNIQA as well as at least one representative of the business partners is present, this is

an acceptable behaviour. In addition, the transparency of the event must be ensured and the public perception must be taken into account. Also, the value of the invitation has to be considered. Invitations of this kind should be limited to joint meals.

Good to know:

Question: A potential business partner would like to give me a "live" presentation of their product and invites me as project manager to a trip to New York. The potential business partner also offers to pay for the plane ticket and accommodation. I would like to see the product in operation before I make my decision. May I accept the invitation?

Answer: Flight and hotel costs must be borne by UNIQA and must not be assumed or reimbursed by a business partner. A trip of this kind is only acceptable if the potential partner does not have a reference customer in geographical vicinity. The adequacy must be checked on an individual basis.

Good to know:

Question: A business partner would like to thank me for my work as a project manager and therefore the business partner would like to send me opera tickets. However, the business partner will not attend the performance. May I accept this gift?

Answer: No, as it is not allowed to attend events without the presence of the business partner.

Specifics regarding benefits to public officials

In general, we refrain from accepting or granting gifts and invitations to or from public officials.

In case a benefit is required due to reasons of respect for the political office and the state, we report this to the Compliance-Function as of a value of 30 EUR. In any case, gifts or invitations with a value of 100 EUR or more are not permitted. However, even if the value is less than 100 EUR, we still evaluate if there is a risk or the appearance of a conflict of interest.

We take into account that next to employees of public authorities, also employees of public institutions or employees of state-owned companies are to be considered as public officials.

Donations and sponsoring

As a responsible member of society, UNIQA Bulgaria grants benefits in cash or in kind for education, science, arts, culture, sports as well as for social and humanitarian projects by means of donations and sponsoring.

Donations

Donations are voluntary benefits for charitable purposes which are given without consideration.

All donations must be transparent. The identity of the recipient and the intended use of the donation must be known and legally justifiable.

No donations are allowed to:

- political parties and their affiliated organizations,

- parties campaigning for elections,
- profit-oriented organizations,
- organizations whose aims are not consistent with the company principles and/or values of UNIQA,
- organizations that could harm UNIQA's reputation.

Donations and other benefits to political parties

Donations and other benefits to or from political parties and their affiliated companies as well as parties campaigning for elections are not permitted.

The only exception from this prohibition is the sponsoring of events that are organized by political parties or their affiliated organizations, but at which no party-political content is discussed and which are open to the general public. We make sure that any appearance of a conflict of interest is avoided.

Good to know:

Question: The local voluntary fire brigade asks for support. Is it possible to make a donation?

Answer: In principle, a donation is possible. The donation has to be approved by the supervisor.

Good to know:

Question: An organization which does not directly belong to a political party but has a close link to a political party asks for support for their summer event. Is this considered as a donation to political parties?

Answer: Yes, and therefore the requested support is not permitted. In case of doubt the request must be evaluated together with the Compliance-Function.

Sponsoring

Sponsoring is the contractually agreed allocation of money, goods or services against advertising.

When it comes to sponsoring, we pay attention to legal requirements, the principle of proportionality, economic feasibility, our values as well as our socio-political and social responsibility. Sponsoring contracts that offer advertising opportunities to UNIQA are not considered donations.

Good to know:

Question: My son is a successful goalkeeper in a soccer club. In autumn a competition for young teams will be held and for that event they look for a sponsor for trophies. Is there a possibility to help?

Answer: In principle, sponsoring is possible in such cases if an appropriate consideration (e.g. installation of UNIQA advertising boards around the soccer field) is granted. The marketing department can provide more detailed information regarding the possibilities in a specific case.

Approval and reporting obligations

The obligation to obtain approval from the supervisor is respected for internal as well as for external benefits. A pre-approval up to a certain lump sum is possible (blanket approval). In addition, the reporting obligations to the Compliance-Function as shown in the following overview are applicable for external benefits.

BASIC RULES		
Internal benefit		Approval by supervisor (blanket approval possible).
External benefit	Value < EUR 100	Approval by supervisor (blanket approval possible).
	Value ≥ EUR 100	Approval by supervisor (blanket approval possible). Retrospective reporting to the Compliance-Function.

SPECIAL RULES		
External benefit	Public official Value < EUR 30	Advance approval by supervisor (blanket approval not possible).
	Public official Value EUR 30.00 – 99.99	Advance approval by supervisor (blanket approval not possible). Retrospective reporting to the Compliance-Function.
	Public official Value ≥ EUR 100	Generally prohibited. In exceptional cases: Advance approval by supervisor (blanket approval not possible). Advance approval by Compliance-Function.
	Donations, sponsorship Value < EUR 100	Advance approval by supervisor (blanket approval not possible).
	Donations, sponsorship Value ≥ EUR 100	Advance approval by supervisor (blanket approval not possible). Retrospective reporting to the Compliance-Function.
	Exceptions from political sponsoring	Regardless of value: Advance approval by supervisor (blanket approval not possible). Value ≥ EUR 100: Advance approval by Compliance-Function.
	Value ≥ EUR 15,000	Advance approval by supervisor (blanket approval not possible). Advance approval by Compliance-Function.

3.6 Dealing with property and confidential information

Information that is especially worth protecting is processed on our premises. On the one hand, we have detailed information about the life situation of our clients and on the other hand our procedures and methods are an asset which, if disclosed, could be used to our disadvantage.

Company equipment and company property

As a general rule, company property may be used for business purposes only. We protect the company's property against misuse, loss and theft. Besides material assets such as operating resources, the company's property also includes immaterial assets such as intellectual property including software licenses.

We respect the internal regulations regarding the use of operating resources and the companies' resources (including but not limited to telephone, computers, internet and other information technologies).

Data protection / Protection of business secrets

The right to privacy is considered a human right and must therefore be protected. We comply with data protection provisions and ensure that personal data (for example data which is clearly attributable to a specific person) is protected reliably against unauthorised access and that all necessary measures to combat cyber-attacks are implemented in the company. Personal data may be passed on only in cases provided by law.

When personal data is collected and processed, the fundamental rights, freedom and the dignity of the persons concerned are safeguarded.

We are obliged to maintain secrecy regarding all internal confidential matters as well as regarding confidential information which concerns business partners and clients. In addition, operational and business secrets must explicitly be considered confidential.

The obligation to maintain confidentiality has to be complied with also after termination of the employment. In case of violations, UNIQA reserves the right to take appropriate measures.

Good to know:

Question: I would like to make a data analysis on my home computer in the evening. For that purpose, I would like to save the relevant client data on a USB stick and take it home with me. Is this in line with our security requirements?

Answer: No. Storing client data on external media is not allowed. The data analysis must either be done in the office or at home using the company notebook.

3.7 Competition-compliant behavior

We are market participants and thus rely on a functioning market. Due to our excellent performance, we are in the position to design the market by innovation and quality.

We manage our business in full compliance with applicable laws and regulations within an open and honest framework based on integrity and good faith. Therefore, we reject practices that violate the principles of competition and of a free market.

We are convinced that it is indispensable for competition that we act fairly and in a quality-oriented manner.

Actions that are unfair and anti-competitive are not permitted. Our behaviour in competition must be such that the market is not adversely affected by market-sharing agreements, misuse of market power or concentration of market power. This includes: agreements on prices, agreements on terms and conditions, allocation of the market (territories, clients, ratios), joint marketing with competitors, exchange of market-relevant information, etc.

Insider information

Insider information is not publicly available, detailed information about listed companies like UNIQA which might have a considerable influence on the stock exchange price if it becomes publicly known. Such knowledge provides an advantage over other market participants and therefore puts the functioning of the organised capital market at risk. Misuse of such information is a chargeable offence.

Employees must not provide themselves or a third party with an advantage by exploiting or passing on insider information or confidential, price-sensitive information. In addition, it must be refrained from recommendations to buy or sell shares.

Passing on of insider information and confidential, price-sensitive information to other employees within the company and the UNIQA Group is only permitted if they need such information for fulfilling their tasks.

Good to know:

Question: During my long-lasting employment as a sales representative of UNIQA I have built up a large client portfolio. I am highly recognized in my area of work and a competitor is offering me a position as area manager. May I take the client portfolio data with me?

Answer: No. Taking client portfolio data with you is not in line with the rules of competition and it is even chargeable.

Good to know:

Question: During lunch a colleague of the claims department tells me about a new and serious liability case of an industrial client. As UNIQA employee I am however not involved in key account business

activities and I have nothing to do with the client in terms of business. Is it permitted to pass on such information?

Answer: My colleague's conduct was incorrect because such client information must be treated confidentially.

3.8 Conflicts of interest

We as employees are guided exclusively by the interests of the company. We must ensure that private interests are not in conflict with our obligations to UNIQA Bulgaria. An intertwining of company and private interests at the expense of UNIQA is not permitted.

This includes for example contracts and negotiations from which we or persons close to us (for example relatives, friends, etc.) may benefit from. Also, taking on secondary employments, consulting jobs, functions in legal entities or political offices may lead to conflicts of interests.

Every potential conflict of interest must be reported to the supervisor who has to evaluate the situation.

Good to know:

Question: As an UNIQA expert, an external training provider invites me as lecturer to a half-day seminar for a fee. May I give the lecture?

Answer: In principle, the lecturing activity is acceptable under the condition that the fee is reasonable and that no corporate know-how is disclosed in the presented information. In any case, approval from the supervisor is required, furthermore an approval of the lecturing activity by Human Resources and a report to the Compliance-Function is necessary.

Good to know:

Question: I am offered to run for a district council member on a safe place on the party list. May I accept the offer?

Answer: The supervisor has to be informed about the candidacy and Human Resources as well as the Compliance-Function have to approve the acceptance of the candidacy.

3.9 Sustainability

In addition to the ambition for economic success, we aim as insurance company also for the creation of ecological and social values.

Therefore, we understand sustainability as an opportunity to improve our business model, our company and the world. At the same time, we attempt to not only comply with the legal regulations. Minimal goals are not sufficient for us when it comes to sustainability. We strive to be role models in our focus areas climate and demographic change.

We are convinced that it is not enough if only we act in a sustainable way. For that reason, we motivate our customers to commit themselves to sustainability.

Furthermore, the following principles of the UN Global Compact (UNGC) are relevant for us in the scope of investment, underwriting as well as ongoing operations:

Human Rights

- Principle 1: We support and respect the protection of internationally proclaimed human rights.
- Principle 2: We make sure that we are not complicit in human rights abuses.

Labour

- Principle 3: We uphold the freedom of association and the effective recognition of the right to collective bargaining.
- Principle 4: We are committed to the elimination of all forms of forced and compulsory labour.
- Principle 5: We are committed to the abolition of child labour.
- Principle 6: We advocate the elimination of discrimination in respect of employment and occupation.

Environment

- Principle 7: We support a precautionary approach to environmental challenges.
- Principle 8: We undertake initiatives to promote greater environmental responsibility.
- Principle 9: We encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- Principle 10: We work against corruption in all its forms, including extortion and bribery.

We are convinced that the adherence to these principles in combination with the consideration of the UN Sustainable Development Goals (SDGs) is essential for fair competition and for safeguarding our reputation.

For this reason, UNIQA has also publicly declared its commitment to these principles in a letter from the UNIQA Group CEO to the United Nations.

Good to know:

Question: What is the value of declaring our commitment to internationally recognized principles of supra-national organizations such as the United Nations?

Answer: The assessability of our sustainable acting by publication in an annual progress report is an important foundation for maintaining the trust of clients, investors, employees and the public. The annual Non-Financial Report is in this respect an important source of information.

3.10 Communication

We emphasize complete, honest, accurate, timely and understandable reporting in every area. Everyone who acts for UNIQA Bulgaria as employee, supervisor, Management Board Member or Supervisory Board Member ensures this.

We support honest and true reporting both inside and outside the company which makes us credible.

Communication with the media, our shareholders and supervisory authorities has to be carried out exclusively by the relevant Management Board Member or the employees explicitly assigned and authorised by the relevant Management Board Member. Every communication with the media or shareholders is aligned in advance with the PR Communication Unit in UNIQA Bulgaria.

3.11 Contact

Every report of Compliance-relevant incidents will be treated confidentially and upon request also anonymously. UNIQA Bulgaria guarantees special protection and support to everyone who turns in a well-founded complaint or report with a good conscience and in good faith. The following persons are at your disposal for reports of illegal acts or breaches of the Code of Conduct:

Management Board Member

Boris Palichev

Phone: 0700 111 50

E-mail: boris.palichev@uniqa.bg

Head of Compliance Function / Compliance Officer

Liliana Nikolova

Phone: 0700 111 50

E-Mail: lilyana.nikolova@uniqa.bg

Whistleblowing system published on the UNIQA Bulgaria official website at www.uniqa.bg

Good to know:

If you face a difficult decision it helps to ask yourself the following questions:

- Is my behaviour in conformity with the law and in line with UNIQA's internal regulations?
- What do others think about my actions?
- Is there a risk that my behaviour casts a shadow on UNIQA and that I risk the company's reputation?
- Would my family and my friends consider my behaviour as ethical?
- Would it be fine with me if my actions would be covered by the media?

In the case of doubt the Compliance-Function will be happy to support you.

4 Change Log

Version	Changes	Effective Date
2.0	Extension of the regulations regarding the prevention of corruption.	01.01.2013
3.0	Details of the scope of application; Gendering; Inclusion of the Guiding Principles; Extension of the regulations regarding the prevention of corruption (prohibition of political benefits); Inclusion of the topic „Sustainability“.	17.03.2021

Appendix ./1: Scope of Application

<ul style="list-style-type: none"> ▪ (Re)Insurance Business Units ▪ Non-(Re)Insurance Business Units ▪ Branches of (Re)Insurance Business Units/ Non-(Re)Insurance Business Units 	Business Unit shall enact and enforce all provisions of this document. The fulfillment of the Sign-off Confirmation sheet is mandatory.		
	Sign own Sign-off Confirmation sheet.	1. Sign own Sign-off Confirmation sheet. 2. Communicate the Code of Conduct to subordinated organizations and collect their Sign-off Confirmation sheets.	Subordinated organizations
UNIQA Insurance plc.		x	
Vitosha Auto OOD			x
UNIQA Life Insurance plc.		x	

Appendix ./2: Sign-off Confirmation Business Units/Branches

Signature sheet for Sign-off Confirmation	
	UNIQA Code of Conduct
Version	3.0
Effective Date	01.02.2021
Effective Date	17.03.2021

The signatories stated below, acting on behalf of UNIQA Insurance plc and UNIQA Life Insurance plc, decided on 17.03.2021 to implement the provisions of the UNIQA Code of Conduct to the extent defined in the Scope of the UNIQA Code of Conduct.

We thus confirm that the UNIQA Code of Conduct was enacted and implemented in accordance with the applicable local legal provisions. The UNIQA Code of Conduct is binding for the corporate bodies and employees of UNIQA Insurance plc and UNIQA Life Insurance plc.

The UNIQA Code of Conduct was enacted and implemented in following subordinated Business Units and/or Branches of UNIQA Insurance plc and UNIQA Life Insurance plc:

**UNIQA Insurance plc and
UNIQA Life Insurance plc**

Boris Palichev

Member of the Management Board

Date, Signature

Dimitar Tonev

Member of the Management Board

Date, Signature

Appendix .4: Summary Document



Document	UNIQA Code of Conduct
Version	3.0
Effective Date	17.03.2021
Author(s)	Liliana Nikolova, Head of Compliance

Aim of the UNIQA Code of Conduct

The UNIQA Code of Conduct plays the important part to rule the responsibility and behavior towards our colleagues, business partners and our clients. Furthermore, it gives direction in situations in which it is not fully clear how to behave and it shall protect the reputation of the UNIQA brand.

This Level 3 Document (Other Regulation) is supplementing the UBG Compliance Policy, the UBG Compliance Standard.

This document shall be reviewed once per year by the authors, as required to reflect amendments of its legal basis (if any) and other relevant developments in UNIQA Bulgaria, as the case may be.

Scope of the UNIQA Code of Conduct

The (Re)Insurance Business Units, Branches and Non-(Re)Insurance Business Units of UBG, which are listed in Appendix .1, shall implement the UNIQA Code of Conduct Group to the full extent.

The implementation process is described in the Group and UBG Policy-Management Standard.

Main contents of the UNIQA Code of Conduct

- Aims, Legal Basis and Review
- Scope
- Content of the UNIQA Code of Conduct:
 - Foreword
 - Guiding Principles
 - Ethical management and legal compliance
 - Etiquette
 - Benefits
 - Dealing with property and confidential information
 - Competition-compliant behaviour
 - Conflicts of interest
 - Sustainability
 - Communication
 - Contact