

“GCL International Bulgaria” Ltd. (“the Company”) is committed to the practice of responsible corporate behaviour.

Through its business practices the Company seeks to protect and promote the human rights and basic freedoms of all its employees and agents.

Further the Company is committed to protecting the rights of all of those whose work contributes to the success of the Company, including those employees and agents of suppliers to the Company.

The Company is also committed to eliminating bribery and corruption. It is essential that all employees and persons associated with the Company adhere to this policy and abstain from giving or receiving bribes of any form.

This policy is non-exhaustive, and all aspects of the Company’s business should be considered in the spirit of this policy.

### **Fair Competition**

The Company engages in practice an open, and equitable competition in the marketing based on audit professionalism, value of services, competitive price and customer service etc.

Transfer of certification from another Certification Bodies should be fair and comply with applicable procedures and guidelines of accreditation bodies or scheme owners.

### **Anti-Bribery and Corruption**

The Company is fundamentally opposed to any acts of bribery and to the making of facilitation payments as defined by the Bribery Act 2010.

Employees and any other persons associated with the Company such as agents, subsidiaries and business partners are not permitted to either offer or receive any type of bribe and/or facilitation payment.

All employees are encouraged to report any suspicion of corruption or bribery within the Company in accordance with the Whistleblowing Policy available on GCL website.

The Company uses its reasonable endeavours to implement the guidance principles on bribery management that are published, from time to time, by Secretary of State in accordance with Section 9 of the Bribery Act 2010.

If an employee or associated person is found guilty of giving or receiving a bribe, he/she will be personally criminally liable and may be subject to disciplinary action.

Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

### **Conflicts of Interest**

The Company holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers and employees. Conflicts of interest potentially undermine the relationship of the Company with its partners.

In order to help preserve and strengthen these relationships the Company has developed a Corporate Hospitality and Gifts Policy, which provide rules and guidelines concerning the conduct of its officers and employees aimed at minimising the possibility of conflicts of interest and at avoiding risks associated with bribery and corruption. Copies of the Corporate Hospitality and Gifts Policy are available on our website: **[www.gcl-intl.bg](http://www.gcl-intl.bg)**

All officers, employees and representatives of the Company are expected to act honestly, within the law and non-discriminatory.

Access to the certification process will not be conditional upon the size of the client or membership of any association or group, nor will certification be conditional upon the number of certifications already issued. There will not be undue financial or other conditions.

### **Shareholders and Investors**

Shareholder & Investor should not involve in the Company day-to-day operations. They shall not on any occasion, influence the certification decision of any audits to ensure impartiality of the certification.

On the other hand, the Company, its officers, employees and representatives are committed to ensuring that no act or omission which is within their power, and which would have the effect of deliberately,



## BUSSINESS ETHICAL POLICY

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negligently or recklessly misleading the shareholders, creditors or other investors in the Company occurs.

### **Suppliers and Partners**

The Company expects all subcontract and freelance auditors, suppliers and partners to work towards and uphold similar ethical and moral standards.

The Company will conduct a background check pertaining ethical record of potential auditors, suppliers, and partners before entering into any agreement. Further, the Company reserves the right to request information from above parties regarding the production and sources of goods supplied.

The Company also reserves the right to withdraw from any agreement or other arrangement with any auditors, supplier or partner who is found to have acted in contravention of the spirit or principles of this Ethical Policy.

### **Other Policies**

This Business Ethical Policy should be read in conjunction with Social Accountability Policy concerning Human Rights & Workers' Rights, Environmental Policy which addressing Environmental Issues, Privacy & Data Protection Policy for information and confidentiality.