

# **CODE OF ETHICS OF THE INTERLEASE EAD EMPLOYEES**

## **PRINCIPLES**

**Art.1.** This Code contains the basic principles and rules of ethical and professional conduct, which should be adhered to by all employees of Interlease EAD (the Company).

**Art.2.** When performing their professional obligations, the employees of Interlease must be guided by the principles of legality, confidentiality, loyalty and ethics.

**Art.3.** The ethical relations with the clients and among employees of Interlease, in personal and professional aspect, are the main rule of conduct. Circumstances, which could compromise this principle, should be avoided.

## **RULES**

### **Compliance with laws and Professionalism**

**Art.4.** The employees of Interlease are obliged to know and observe the laws, related to their professional activity, the regulations, contained herein and the active internal rules of the Company, regulating their obligations.

**Art.5.** In fulfilling their obligations, the employees must respect the interests and rights of the clients, observing the internal rules of Interlease.

**Art.6.** The employees should strive to maintain and increase their qualification and approach their professional obligations with due care.

### **Confidentiality**

**Art.7.** The employees must keep the business secret and the good name of Company's clients, as for that purpose they should not disclose information regarding current, future and potential clients, unless:

- the information refers to illegal activities on behalf of clients or the potential clients
- the law requires that information to be disclosed
- the client/potential client has given his consent for the disclosing of the information

**Art.8.** The employees must observe strictly Company's rules, regarding the protection of the information and they must be discrete, when using and storing documents, in order to prevent any adverse consequences for its shareholders, business partners and clients.

**Art.9.** The employees must be discreet and not disclose information, regarding other Interlease employees, which has become known to them, in the course of performance of their professional obligations.

### **Conflict of Interests**

**Art.10.** While working for Interlease, the employees should not establish other business relations, contradicting or capable of contradicting the interests of the Company, its shareholders, business partners and clients.

**Art.11.** Any employee, who discovers that his/her personal, financial or business interests (or such of his/her direct relatives, spouse), may result in or could result in conflict with the interests of the Company or its clients, must immediately inform his/her direct manager of that.

**Art.12.** The employee is obliged to declare in advance the absence of such interests or relations, with respect to third persons, in the process of approval of lease transactions and other transactions of the Company, where he/she participates.

**Art.13.** Each and every administrator of Interlease is obliged to disclose in writing to the management, any and all existing trade, financial or other business interest, which he/she or members of his/her family have of the contracting of a business transaction by the Company.

#### **Loyalty and Corporate Identity**

**Art.14.** The employees are forbidden to use computers, software, telecommunications, buildings offices and other property of the Company for their own purposes or to benefit third parties, outside the generally accepted practice.

**Art. 15.** In performing their professional obligations, the employees of Interlease must act in favor of the Company, they must not disclose confidential information or cause in any manner whatsoever, directly or indirectly, damages to Interlease.

**Art.16.** The employees must refrain from political manifestations at their place of work, if this results in conflicts with their business obligations and status.

**Art.17.** The conduct of the employees at their place of work and in their personal lives must not affect adversely Company's prestige in the society.

**Art.18.** Each and every employee must adhere to the business style of communication and dressing.

**Art.19.** The employees should manage their personal financial matters, avoiding any financial difficulties. In case such difficulties occur, the problem should be discussed with the direct manager in order to find a solution.

### **Business Ethics**

**Art.20.** The employees must not accept commissions, gifts, services and other benefits, contradicting or capable of establishing a conflict of interests with the interests of the Company.

**Art.21.** The employees must not request or accept gifts and/or facilities from third persons, which may be binding or obstructing their capability to make independent professional judgments.

**Art.22.** In establishing and maintaining relations with partners and clients, the employees may accept minor promotion souvenirs with value not exceeding 50 BGN, as well as to share the usual forms of hospitality.

### **Media Statements**

**Art.23.** No employees of Interlease may contact or make statements to the media on behalf of the Company, unless he/she is authorized for that purpose by the Executive Manager.

## **TRANSITIVE AND CONCLUSIVE PROVISIONS**

**§1.** The regulations of the Code of Ethics are mandatory for any and all employees. Their non-fulfillment is a non-fulfillment of the labor obligations, as specified in the Labor Code.

**§2.** This Code of Ethics has been approved by the Chief Executive Officer on **16.01.2006**.