

MAKLER INTERNATIONAL`S CODE OF CONDUCT

INTRODUCTION

This is our Code of Conduct – our guide to do the right thing in business. It is a must-read and must-follow by all of us. It is focused on important principles as safety, health, security, honesty, equal opportunities, harassment-free workplace for the people. Respect for the laws, respect for the nature and our customers.

We would like to ensure our customers, that all products delivered to them are produced under the conditions compatible to:

-ILO 8 core convention no. 29.87.98.100.105.111.138 and 182

-UN Convention on the rights of the Child

-The occupational health and safety legislation in force in the country of manufacture, as well as the labour law, incl. legislation on minimum wage and social insurance in the country of manufacture – Bulgaria.

In the text below Makler Komers EOOD is referred to as The Company.

1. Compliance

As a general rule, our main responsibility as a Company is to comply with national legislation in the countries in which we operate. If any of the requirements in the Code of Conduct differs from the requirements in national legislation, the more stringent requirements must be applied.

2. Freedom of association and the right to enter into collective agreements

All employees shall be entitled to freely establish, join and organize trade unions and to negotiate collectively with the Company. In cases where the freedom of association and the right to enter into a collective agreement is restricted by law, we allow our employees to choose their own representatives. We as Company shall in no way prevent the establishment, maintenance or administration of such employee organizations or collective bargaining. The Company may not take disciplinary or discriminatory measures against employees who organize or employees who are members of a trade union.

3. Prohibition on discrimination

All forms of discrimination are prohibited in respect of recruitment, pay, access to training, promotion, termination of employment, on the grounds of gender, age, religion, ethnicity, nationality, disability, illness, membership of an employee organization (including a trade union), political opinion, sexual orientation, or other circumstances which may give rise of discrimination.

4. Pay

Pay for ordinary working hours, overtime work and other overtime pay must not be below the minimum amounts prescribed by law, but with the objective of being increased to cover actual living cost. Unlawful, unauthorized pay deductions are not permitted. The Company shall ensure the employees are regularly provided with clear unambiguous information about pay and benefits. The Company shall also ensure that pay and benefits are paid in a way that is practical for the employees.

5. Working hours

The company shall comply with applicable national legislation and industry standards as regards working hours and public holidays. The maximum permitted number of working hours per week may not exceed 48 hours per week on a regular basis and permitted overtime may not exceed 12 hours per week. Employees shall be entitled to a minimum continuous period of leave of 24 hours per week.

An exemption from this rule may be made if the following two conditions are satisfied:

- National law permits the number of working hours to exceed this limit and a freely-negotiated and binding collective bargaining agreement is in place which allows for working hours to be calculated based on an average, including sufficient rest period.

6. Health and safety in the workplace

The Company shall provide a safe and healthy environment. The Company shall take measures to prevent the risk of accident at work. The Company shall draw up and comply with clear rules and procedures concerning health and safety in the workplace. Safety equipment shall be provided to and used by employees. Emergency exits shall be provided on all floors and be clearly marked and well-lit, shall not be blocked and shall be accessible for evacuation during working hours. All employees shall have access to clean toilets and drinking water and hygienic where required well adapted areas for storing food. All employees shall receive regular, documented health and safety trainings. One of the members of the Company's management shall be assigned specific responsibility for the health and safety of the Company's employees. Our Company offers sleeping areas, they are all clean, secure, sufficiently ventilated, with access to clean sanitary facilities and drinking water.

7. Prohibition of a child labour

Child labour shall not be acceptable. We have no employee under 18 years, the minimum age according to the Bulgarian legislation. The Company may employ individuals under 18 years of age, but if it is compulsory for them to attend school, they may only work outside school hours. In respect of employees under 18 years of age, the total number of school hours, working hours and time getting to and from school and may not, under any circumstances, exceed 10 hours a day and they may not, under any circumstances, work more than 8 hours a day. Employees under 18 years of age may not perform duties which are dangerous and they may not work at night.

8. Prohibition on forced labour and disciplinary measures

All forms of forced labour and hard labour are prohibited. Employees shall at all times be entitled to leave the Company's premises and area at the end of an ordinary working day and shall be entitled to terminate their employment with the Company. The Company may not withhold any portion of an employee's day, benefits, assets or documents. The Company shall treat all employees with dignity and respect. The Company shall not use or tolerate corporal punishment, mental or physical duress or verbal humiliation of employees.

9. Environment

The Company shall comply with applicable environmental legislation and adhere to the precautionary principle. The company shall respect and operate within the limitations by nature as regards the climate, water, biological diversity, animal welfare, fishing and forestry. Methods and standards for waste management, including the goal of reducing wastage in the production stage, management of hazardous waste, and treatment of emissions to air and water, shall satisfy or improve on the minimum requirements imposed by law. Information about substances hazardous to health and the environment which are used shall be available to anyone who comes into contact with these substances. The Company shall support preventative measures to combat environmental problems.

10. Bribery and corruption

The Company shall comply with national legislation and combat all forms of corruption, including blackmail, fraud and bribery. The Company shall draw up and comply with an anti-bribery and corruption policy which covers all of the operations conducted by the Company.

11. Management system

The Company shall draw up and implement a social responsibility policy and a management system which ensure compliance with the criteria in the Code of Conduct. The Company's management shall be responsible for ensuring that the Code of Conduct is implemented and monitored, and that corrective measures are taken in the event of any violations of the Code of Conduct. The Company shall inform all employees about the Code of Conduct and its contents. The Company shall address any information received from employees that the Company is failing to comply with the requirements in the Code of Conduct.

12. Inspections/Audits

The Company shall be able, at the request of any of its partners to provide a written report detailing the manner in which it is satisfying the requirements in the Code of Conduct. In addition the Company agrees to receive unannounced visits to the factory, either personally or through a third independent party in order to monitor the compliance with the Code of Conduct. The Company shall provide all documents relevant to the inspection.

13. Customer Care

Our main target is to manufacture variety of high quality products, to be correct, transparent and supportive supplier for our customers. Our goals are:

- To Give solutions when needed
- To be available
- To be creative
- To be responsible
- To show positive attitude

14. Non compliance

The code applies to our management, to all our employees and Makler activities.