

ANTHILL ESG POLICIES

In 2023, the European Commission introduced the European Sustainability Reporting Standards (ESRS) under the Corporate Sustainability Reporting Directive (CSRD). This directive mandates companies to report their environmental and societal impacts and ensures the authenticity of the reported data. While Anthill is not currently under the CSRD's purview, it is anticipated that by 2025, the company will meet the directive's criteria. To prepare for this, Anthill has established comprehensive ESG policies. These guidelines encompass environmental policies, such as energy efficiency and waste management; social policies, including employee well-being and community engagement; and governance policies, which involve risk assessment, crisis management, and affiliations with prominent business associations. Through these guidelines, Anthill aims to demonstrate its commitment to sustainability, transparency, and ethical business practices.

Anthill ESG Policies | Last update: 04.12.2023

Anthill and ESG Reporting Standards

In July 2023, the <u>European Commission adopted the first set of European Sustainability Reporting Standards (ESRS)</u> under the <u>Corporate Sustainability Reporting Directive (CSRD)</u> which requires companies to report on the impact of corporate activities on the environment and society and requires the audit (assurance) of reported information. Companies subject to the CSRD will have to report according to European Sustainability Reporting Standards (ESRS).

The Corporate Sustainability Reporting Directive delineates the entities that are subject to these augmented reporting standards and the effective dates for compliance. As of this juncture, Anthill is not encompassed within the CSRD's jurisdiction nor obligated to report in alignment with the ESRS. However, based on our projections, we anticipate that by the fiscal year 2025, Anthill will conform to at least two of the three enumerated criteria: an annual average of 250 employees or more, total assets of 25 million euros, or 50 million euros in sales. Considering these projections, we are strategically positioning ourselves for the fiscal year 2025 and the annual report of 2026, underpinned by this ESG Reporting Framework.

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Preamble

In an era marked by rapid technological advancements, global interconnectedness, and heightened public awareness of environmental, social, and governance (ESG) issues, businesses are no longer evaluated solely based on their financial performance. Stakeholders, ranging from investors to consumers, are increasingly demanding that companies demonstrate a commitment to sustainable and responsible operations. Recognizing this paradigm shift, Anthill has taken proactive steps to integrate ESG considerations into its core business strategy.

The IT sector, while instrumental in driving innovation and economic growth, is not immune to the challenges posed by ESG concerns. From the environmental impact of data centers to the ethical implications of artificial intelligence, IT companies are at the nexus of a multitude of ESG issues. As a leading Bulgarian IT company, Anthill acknowledges its role and responsibility in addressing these challenges head-on.

The following guidelines serve as a testament to Anthill's dedication to upholding the highest ESG standards. They are designed to provide a clear framework for our actions, ensuring that we not only comply with regulatory requirements but also strive to exceed them, setting a benchmark for the industry.

1.1. Objective of the Guidelines

The primary objective of these ESG guidelines is to articulate Anthill's commitment to integrating environmental, social, and governance considerations into its business operations and strategic decision-making processes. These guidelines are not merely a statement of intent; they are a reflection of our corporate ethos and a roadmap for our future endeavors.

Several key objectives underpin these guidelines:

Transparency: To provide a clear and comprehensive overview of Anthill's ESG commitments, ensuring that all stakeholders, from employees to investors, have a thorough understanding of our policies and practices.

Accountability: To establish a set of standards and expectations against which Anthill's performance can be measured, ensuring that we remain accountable to our stakeholders and true to our commitments.

Continuous Improvement: Recognizing that the ESG landscape is dynamic and ever evolving, these guidelines are designed to be adaptable, allowing Anthill to continuously refine its approach in response to new challenges and opportunities.

Stakeholder Engagement: To foster open dialogue and collaboration with our stakeholders, ensuring that their insights and feedback are integral to our ESG strategy.

Leadership: To position Anthill as a leader in ESG best practices within the IT sector, inspiring other companies to follow suit and raising the bar for the entire industry.

1.2. Applicability and Scope

The ESG guidelines apply to all facets of Anthill's operations, encompassing our headquarters in Sofia, Bulgaria, regional office in Munich, Germany, and any other facilities or entities under our purview. They are relevant to all employees, from senior management to entry-level staff, as well as contractors, suppliers, and partners associated with Anthill.

The scope of these guidelines is comprehensive, addressing the full spectrum of ESG issues relevant to the IT sector. This includes, but is not limited to:

Environmental: Policies and practices related to energy consumption, waste management, carbon footprint reduction, sustainable procurement, and water conservation.

Social: Initiatives aimed at promoting employee well-being, diversity and inclusion, community engagement, and ethical customer and partner relations.

Governance: Standards pertaining to ethical business conduct, transparent reporting, stakeholder engagement, and risk management.

It is important to note that while these guidelines provide a robust framework for Anthill's ESG commitments, they are not static. As the ESG landscape evolves, so will these guidelines. Regular reviews will be conducted to ensure their continued relevance and effectiveness, with updates made as necessary to reflect new developments, challenges, and opportunities.

In conclusion, this preamble serves as a foundation for Anthill's ESG guidelines, underscoring our unwavering commitment to sustainable and responsible business practices. As we navigate the complexities of the 21st-century business environment, these guidelines will be our compass, guiding our actions and ensuring that we remain at the forefront of ESG best practices in the IT sector.

Environmental Policies



At Anthill, we recognize the profound impact that businesses can have on the environment. As a forward-thinking IT company, we are committed to minimizing our ecological footprint and fostering a culture of sustainability. Our environmental policies are designed to guide our actions in this regard, ensuring that we operate in an environmentally responsible manner.

2.1. Energy Efficiency Policy

Hybrid Working Setting: Recognizing the environmental benefits of reduced commuting and office energy consumption, Anthill has adopted a hybrid working model. This approach not only reduces our carbon footprint but also offers our employees greater flexibility and work-life balance.

Office Location and Enhanced Sustainability: At Anthill, our choice of Class A office spaces is a fundamental part of our strategy to support our sustainability values. The relocation to <u>Office X</u> marks an advancement in our Environmental, Social, and Governance (ESG) commitments. Located in the vibrant Lozenets district of Sofia, this move embodies our dedication to environmental sustainability, social responsibility, and governance excellence. We have consistently chosen Class A office spaces like <u>FPI</u>

<u>Business Center</u>, <u>Business Park Sofia</u> (our previous locations), and now Office X (our current location) for their strong commitment to the environment. This strategy ensures that our workplaces reflect our deep values in sustainability and responsibility, reinforcing our commitment to being an environmentally conscious and socially responsible business.

The design and operation of Office X reflect our holistic approach to sustainability. The building's energy-efficient features and advanced systems demonstrate a commitment to reducing energy consumption and enhancing environmental stewardship.

2.2. Data Management and Cloud Storage Policy

Microsoft Cloud Storage: In our efforts to optimize energy consumption and reduce the environmental impact of data storage, Anthill utilizes Microsoft Azure Cloud. Cloud storage solutions, compared to traditional data centers, are known for their energy efficiency and reduced carbon footprint. Cloud storage solution's inherent design principles, like:

- Infrastructure Efficiency,
- Resource Pooling,
- Energy Efficient Design and Maintenance Principles,
- Economy of Scale,
- Dynamic Resource Allocation,

combined with the scale and technological advancements of major cloud providers like Microsoft, make it a more energy-efficient and environmentally friendly option for data storage and management.

Green Data Center Initiative in Sofia: Anthill's 2022-2023 initiative to establish a Green Data Center in Sofia, in collaboration with Estonia's <u>Greenergy Data Centers</u>, aimed to integrate Tallinn's successful green data center model. This project, focused on renewable energy and innovative heat repurposing, promised significant environmental and regional IT ecosystem advancement. Despite securing a Letter of Intent for over 70 million euros from the <u>Three Seas Initiative Investment Fund</u>, current political uncertainties in Bulgarian have paused this transformative project. Anthill remains dedicated to this vision, hopeful for future opportunities to contribute to the region's technological and environmental progress.

2.3. Waste Management Policy

Integrating Sustainable Waste Management at Anthill: Anthill's separate waste collection system within our Class A office spaces is a testament to our environmental responsibility commitment. This initiative transcends mere waste segregation; it cultivates a recycling culture and directs waste towards the most sustainable processing routes.

Our waste collection approach aligns with our Class A office spaces' established principles, benefiting from their advanced waste management infrastructure. This integration ensures a robust and effective waste categorization, where different types of waste like organic, plastic, glass, paper, and metal are separately collected. This segregation enhances the recycling process and maintains the quality of recyclables, facilitating their reintroduction into the production cycle.

Moreover, our initiative significantly reduces the volume of landfill waste, addressing environmental concerns such as groundwater contamination and methane emissions. Educational measures play a crucial role, with clear signage and campaigns within the office spaces, educating tenants about proper waste disposal methods.

Regular monitoring and feedback from our Class A office management ensure the system's effectiveness, promoting continuous improvements in our waste management practices. This cohesive approach not only fulfills our role as a responsible tenant but also contributes to a collective effort towards environmental sustainability. By participating in this communal endeavor, Anthill aims to set a standard in corporate waste management and make a meaningful environmental impact.

2.4. Sustainable Procurement Policy

Microsoft Software: As part of our sustainable procurement policy, we have chosen Microsoft for their commitment to sustainability. Microsoft's dedication to reducing carbon emissions, advancing renewable energy, and promoting sustainable data management aligns with our ESG goals. Their initiatives in developing eco-friendly cloud solutions and commitment to becoming carbon negative by 2030 make them an ideal partner in our journey towards sustainable IT practices.

Lenovo Hardware: In selecting Lenovo as our hardware vendor, we align with a company that shares our vision for environmental responsibility. Lenovo's commitment to sustainability is evident in their efforts to reduce greenhouse gas emissions, use sustainable materials, and implement energy-efficient manufacturing processes. Their focus on creating more sustainable products and reducing the environmental impact of their operations complements our goal of responsible and sustainable procurement.

Furthermore, we extend the life cycle of Lenovo hardware by offering our team members the opportunity to purchase these devices at a symbolic price after their warranty period expires. This practice not only promotes sustainability by reducing electronic waste but also empowers our employees by making technology more accessible.

Office Infrastructure: In aligning with Anthill's Sustainable Procurement Policy, our commitment to occupying Class A office spaces is a key aspect of our governance strategy. This approach is not confined to a single location but is a broader commitment to ensure that all office spaces that we have occupied over time, including Office X from the beginning of 2024, embody the highest standards of sustainable building practices. This strategic emphasis on Class A office spaces is reflective of our ethical management and responsible decision-making processes. By consistently choosing office environments that are recognized for their sustainability credentials (like FPI Business Center and Business Park Sofia - our previous locations), we underscore our dedication to ethical procurement practices. This policy is a cornerstone of our governance approach, ensuring that our operational choices, from office locations to partnerships, are aligned with our overarching commitment to sustainability and responsible corporate conduct.

2.5. Transportation and Commuting Policy

Public Transportation: Our office's strategic location, with its excellent connectivity to the city's transportation network, encourages the use of public transit. By promoting the use of buses, trams, and other public transportation modes, we aim to reduce the carbon emissions associated with daily commutes.

2.6. Anthill's Green Initiative: Nurturing Nature Through Collective Action

At Anthill, our commitment to the environment is deeply rooted, inspired by the intricate ecosystems of the natural world, symbolized by the industrious ants that resonate with our company's ethos. Our name is not just a representation of our collaborative spirit but also a nod to the delicate balance of nature and our responsibility towards it.

Commitment to Nature: In alignment with global initiatives like World Environment Day, we actively seek opportunities to contribute positively to our surroundings. Our recent endeavor at <u>Zlatnite Mostove</u> on Vitosha Mountain (within the <u>Vitosha Nature Park</u>, established as protected area in 1934) is one testament to this commitment. Recognizing the beauty and significance of this natural haven, our team took proactive steps to clean up the area, ensuring that its pristine beauty remains untarnished for future generations.

Infrastructure for Sustainability: Beyond just cleaning, we believe in creating sustainable infrastructures that promote environmental awareness and responsible behavior. Our installation of new information signs serves as a gentle reminder to visitors about the importance of preserving nature. Additionally, the tables and benches we've set up are not just amenities; they're invitations for individuals to pause, reflect, and connect with nature, fostering a deeper appreciation for the environment.

Teamwork for a Greener Future: At the heart of our environmental initiatives is our collective spirit. We take immense pride in the impact our teamwork can achieve, especially when channeled toward noble causes like environmental conservation. Every step we take, no matter how small, is a stride towards a cleaner, greener future. We believe that by working together, we can create a ripple effect, inspiring others to join us in our mission to safeguard our planet for generations to come.

In conclusion, Anthill's environmental policies are a testament to our commitment to sustainability. We continuously seek ways to reduce our environmental impact, be it through energy-efficient practices, waste management, or sustainable procurement. As we grow and evolve, we remain steadfast in our dedication to preserving the environment for future generations.

Social Policies



Anthill's commitment to fostering a positive, inclusive, and growth-oriented work environment is deeply embedded in our corporate ethos. Our social policies reflect our dedication to ensuring the well-being, development, and equal treatment of all our employees. We believe that by investing in our people and promoting a culture of inclusivity and continuous learning, we not only enhance our organizational performance but also contribute positively to the broader community.

3.1. Employee Well-being Policy

Health and Safety: Anthill strictly adheres to the Bulgarian health and safety standards, ensuring a safe and conducive work environment for all employees. Our commitment goes beyond compliance; we actively seek ways to enhance the well-being of our staff.

Medical and Dental Insurance: Recognizing the importance of health, we provide additional medical and dental insurance to our employees, ensuring they have access to quality healthcare services.

Benefits Program: Our extensive benefits program allows employees to choose from a wide range of suppliers and vendors offering services in health, beauty, and other wellness areas. This flexibility ensures that our employees can select benefits that best suit their individual needs and preferences.

Team Participation in Sports Events: Encouraging team spirit and physical well-being, we actively participate as teammates in various sports events, including marathons like The Big Tech Run and Postbank Business Run. These events foster camaraderie and promote a culture of health and fitness within the organization in addition to supporting a charity or social cause.

The Employee Assistance Program: This comprehensive employee support initiative emphasizes Anthill's holistic approach to employee well-being, recognizing the diverse challenges our team members may face. We've introduced the Employee Assistance Program, a dedicated hotline available on weekdays, to provide support for financial, legal, travel, well-being, and insurance concerns. Managed by our Office Manager, this initiative ensures that every Anthill team member has access to expert guidance, reinforcing our commitment to fostering a supportive and resilient workplace environment.

Prioritizing Employee Well-being in the Office Space: Anthill's dedication to social responsibility is evident in our choice of workspace, specifically in our move to Office X. This office space, chosen for its Class A credentials, is designed with a focus on the health and well-being of our employees. The emphasis on maintaining high indoor air quality, providing comfort, and creating a supportive work environment aligns with our goal to foster a positive and healthy workplace. This decision reflects our ongoing commitment to the well-being of our team members, demonstrating how we integrate social responsibility into every aspect of our business operations.

3.2. Diversity and Inclusion Policy

Hiring Practices: At Anthill, our commitment to diversity, equity, and inclusion is deeply ingrained in our organizational culture. Central to this commitment is our approach to recruitment, which is meticulously designed to champion transparency, fairness, and diversity. We employ clear job descriptions, structured interviews, and diverse interview panels to ensure consistent and unbiased evaluations. Our data-driven approaches, like tracking diversity metrics, allow us to continuously refine our hiring practices. Open communication with candidates further underscores our commitment to an equitable recruitment process.

Women in IT: Given that Bulgaria is among the leading countries in terms of number of women in ICT¹, we are proud to contribute to and uphold this progressive trend. With this regard, Anthill is committed to championing gender equality in both hiring practices and compensation. In fact, the share of women in the company as of 1 August 2023, is 37%. While the ICT sector has certain limitations in terms of available female professionals, Bulgaria stands out in the EU with a notable around 29% of women employed in the sector as of 2022. Despite this, there remains a gender pay gap in the industry. At Anthill, we aim to bridge this disparity by ensuring equal pay for equal work, regardless of gender. Our strategic objective is not only to uphold fairness but also to position ourselves as an employer of choice for female specialists in the field.

3.3. Employee Development Policy

Microsoft Certification Programs (external)

As a Microsoft Partner, Anthill is committed to fostering the professional growth of our team through a structured Microsoft Certification Program. This process is a cornerstone of our Social Policies, aimed at upskilling our workforce in alignment with the latest technological advancements and industry standards.

Certification Tracks:

Azure Administrator Associate: This track involves comprehensive training on Azure administration, including managing subscriptions, resources, storage, and virtual machines.

Azure Developer Associate: This track focuses on developing skills in Azure development solutions, encompassing aspects like Azure storage services, security, and cloud development.

Power Platform Developer Associate: This path is dedicated to mastering the Power Platform, covering areas like Power Apps, Power Automate, and Power Bl.

Training and Exam Preparation:

Exam Preparation: Each certification track involves a rigorous preparation phase, utilizing resources from Microsoft and other leading platforms like PluralSight and Udemy.

Anthill

¹ "As of 2022, Bulgaria had the largest share of women among employed information and communication technologies (ICT) specialists in Europe, with around 29% of the positions being held by women.", as reported on Statista here.

Courses and Duration: The courses vary in duration and content, tailored to cover all necessary aspects of each certification area.

Practice Tests: To ensure readiness, our employees undergo a series of practice tests and mock exams.

Final Examination: The culmination of each track is the official Microsoft certification exam, which assesses the employee's competency in the respective area.

Program Structure:

Each certification journey is structured over several weeks, with a mix of self-paced learning, instructor-led sessions, and hands-on practice.

Employees are provided with all necessary resources and support to aid their learning and success in the exams.

Outcome and Benefits:

Successfully certified employees are equipped with cutting-edge skills and knowledge, enhancing their capability to contribute to our organizational goals.

This program not only aligns with our commitment to continuous learning but also solidifies our status as a Microsoft partner, staying ahead in the dynamic IT landscape.

Introduction to SQL and Database Concepts Training Program (internal)

At Anthill, we are committed to fostering a culture of continuous learning and professional development. We are proud of our grass-root upskilling initiative – a 13-week comprehensive training program focused on SQL and Database Concepts, held online and recorded for flexible access. This program, designed and presented by an Anthill team member, aims to equip colleagues with essential skills and advanced techniques in database management and SQL query writing, enhancing their technical proficiency and contributing to their career growth.

The training program covers a wide range of topics, meticulously structured to cater to both beginners and experienced professionals. Participants will embark on a learning journey that begins with the basics of SQL Server Data Types and progresses to mastering complex concepts such as advanced query optimization techniques and dynamic SQL applications. The curriculum includes:

- 1. Fundamentals of SQL: Understanding Database Concepts and Structure
- Exploring SQL Server Data Types: A Comprehensive Overview Gain a solid foundation in understanding the various data types used in SQL Server and their applications.

- 3. Mastering Indexes and Statistics in SQL Server Learn how to optimize database performance through effective use of indexes and understanding statistics.
- 4. Advanced Techniques in SQL Query Writing Delve into the nuances of writing sophisticated SQL queries, including the use of Select, From, Where, Group By, Having, Order By, and Joins.
- 5. Essential SQL Commands Become proficient in fundamental SQL operations such as Insert, Update, Delete, and Merge.
- 6. Utilizing Temporary Tables and Table Variables in SQL Understand the strategic use of temporary tables and table variables for efficient data manipulation.
- 7. Developing and Managing Stored Procedures and Functions Master the creation and management of stored procedures and functions for reusable and efficient code.
- 8. Effective Utilization of Triggers and Cursors in SQL Learn how to use triggers and cursors effectively for automated and iterative data processing.
- Implementing Robust Transactions and Error Handling Strategies Acquire skills
 in ensuring data integrity and handling errors through transactions and error
 management techniques.
- 10. Advanced Query Optimization Techniques in SQL Explore advanced strategies to enhance the performance of SQL queries.
- 11. Introduction to Dynamic SQL: Concepts and Applications Understand the principles and practical applications of dynamic SQL.
- 12. Advanced Data Aggregation Dive into complex data aggregation methods including Grouping Sets, Window Functions, and Set Operations.
- 13. Techniques for Querying JSON Data in SQL Learn the modern techniques of querying and manipulating JSON data within SQL.

This training program is a direct result of a grassroots initiative, showcasing the proactive spirit and collaborative effort of our team members. It reflects a shared commitment to personal and professional development, where everyone's growth is recognized as a vital part of our collective success. Through this program, we celebrate the power of grassroots movements in shaping a learning environment that is both empowering and responsive to the evolving needs of our team in the IT sector. The online format and recorded sessions ensure that all team members, regardless of their schedule or location, can participate and benefit from this valuable learning experience.

Junior Developers Upskilling Program (internal)

We offer a comprehensive 3-month upskilling program for junior developers, ensuring they are equipped with the skills and knowledge required to excel in their roles. The program includes:

1st month: Foundation: Team integration; Introduction to project landscapes and goals; Familiarity with tools, processes, methodologies.

2nd month: Data and Backend: Grasp database fundamentals for versatile applications; Master SQL queries, triggers, and stored procedures; Explore workflow automation; Learn about data integrations.

3rd month: Advanced Skills: Tasks; Migrations; Learn to migrate reports; Testing; Cultivate autonomy in task execution.

Our 3-months intensive upskilling program produces highly motivated professionals, equipped with hands-on experience in real-world project development. This enables them to adapt quickly and become a strategic investment in the client's long-term success.

Management Academy (internal)

Recognizing the importance of effective leadership, we have instituted a 6-months Management Academy for all line managers in Anthill. This academy provides line managers with the tools, techniques, and knowledge required to lead their teams effectively.

The Management Academy program includes:

1st Month: Leadership Foundations in IT

2nd Month: Communication, Collaboration, and Team Dynamics

3rd Month: Time Mastery: Management, Prioritization, and Delegation

4th Month: Performance Excellence and Problem Resolution

5th Month: Emotional Intelligence and Navigating Change

6th Month: Team Motivation and Personal Resilience

The Management Academy at Anthill effectively equips line managers with a comprehensive range of skills and knowledge, from leadership foundations to team motivation, fostering effective leadership and team management over a focused sixmonth program.

Telerik Academy Partnership for Upskilling and Reskilling

Anthill's employee development initiatives are significantly enhanced through our partnership with Telerik Academy, a leader in tech education for over 13 years. As Bulgaria's pioneering private IT education provider, Telerik Academy offers diverse

programs tailored for different career stages, from young learners to seasoned professionals.

This collaboration leverages Telerik Academy's innovative and top-tier educational methods, impacting over 140,000 individuals to date. Their programs are designed for both career beginners and professionals seeking advanced skills, offering comprehensive learning opportunities. This alliance not only provides our employees with premier training but also connects us to a broad network of talented individuals. It aligns seamlessly with Anthill's goal of fostering talent and driving business success via continuous learning and development.

3.4. Community Engagement Policy

Long term support for Telerik Academy School: Anthill is proud to financially support since our foundation the <u>Telerik Academy School</u> in their mission to provide free digital technology trainings accessible to all students aged 9-18 throughout Bulgaria. The trainings aim to equip kids with modern technological skills for the digital professions of the future. In 2022/2023 school year Telerik Academy School trained over 3000 school kids in 140 locations. By investing in the next generation of digital builders, we are playing our part in ensuring a bright future for the IT industry in Bulgaria.

Digital National Alliance initiatives: Long-term support for all initiatives of <u>Digital National Alliance</u> – member of the <u>Digital Skills and Jobs Platform</u> of the European Commission. DNA initiatives aim at enhancing basic and advanced digital skills, with special focus on women and young people, like:

Al&I Factory

DOJOGIRLS

TEENS IN AI

AI N' CYBER

RAILS GIRLS

3.5. Customer and Partner Relations Policy

Quality Assurance certifications: As an organization dedicated to high performance and high quality, Anthill is an ISO-certified company under ISO/IEC 27001:2013 and ISO 9001:2015 standards.

The scope of our ISO/IEC 27001:2013 is: Technology consulting and organizational development services and is valid through 30.10.2025.

The scope of our ISO/IEC 9001:2015 is: Technology consulting and organizational development services and is valid through 11.06.2026.

Data Privacy and Security: We have a robust GDPR system in place, ensuring the privacy and security of our employees' and customers' data. Our commitment to data protection is unwavering, and we continuously strive to uphold the highest standards in this regard.

Code of Conduct: Anthill is committed to implementing the best business practices we are aware of. Our code of conduct (called Internal Labor Regulation) ensures that our interactions with team members, customers, partners, and other stakeholders are always conducted with integrity, transparency, and respect.

In conclusion, Anthill's social policies are a testament to our commitment to our employees, customers, partners, and the broader community. We believe that by fostering a positive work environment, promoting diversity and inclusion, investing in employee development, and engaging with the community, we can drive sustainable growth and make a meaningful impact on society.

Governance Policies



At Anthill, our governance policies are not just about internal practices and ethical standards; they also encompass our active engagement with prominent business associations and chambers of commerce. These affiliations reflect our commitment to industry best practices, collaborative growth, and proactive participation in shaping the business landscape.

4.1. Risk Assessment:

At Anthill, proactive risk management is integral to our operational strategy. We consistently engage in thorough risk assessments, evaluating potential vulnerabilities across all facets of our business. By understanding our risk profile, we can anticipate challenges and devise effective strategies to mitigate them. This forward-thinking approach ensures that we remain resilient in the face of uncertainties, safeguarding our assets, reputation, and stakeholders.

4.2. Crisis Management:

In today's dynamic business environment, the ability to respond swiftly and effectively to unforeseen challenges is crucial. Anthill's crisis management framework is being meticulously designed to address a spectrum of potential crises, ranging from public relations challenges to operational disruptions. By having a robust framework in place,

we ensure that we can navigate crises with minimal impact, maintaining stakeholder trust and upholding our brand's integrity.

4.3. Stakeholder Communication Management

Effective communication is a cornerstone of Anthill's governance policies. We believe that transparent, timely, and relevant communication fosters trust, drives engagement, and ensures that all stakeholders, both internal and external, are well-informed and aligned with our corporate vision and objectives. Here's a comprehensive breakdown of our communication channels and the frequency of content dissemination:

Internal Communication Channels:

Open Positions & Referral Program Reminder: Every two weeks, we remind our team of open roles and the benefits of our referral program, ensuring that potential opportunities are widely known and that we tap into the networks of our existing team for talent acquisition.

Anthill x CCC Newsletter: Our monthly newsletter provides updates on collaborations, projects, and company-wide achievements, ensuring that our team is always in the loop about our ongoing ventures and successes.

Internal Newsletter: Distributed monthly, this newsletter offers insights into company updates, team achievements, and other relevant internal news.

Event Invites: Sent on an ad hoc basis, these invites ensure that all team members are aware of upcoming events, workshops, or team-building activities.

Event Initiatives

AntSkill: A monthly initiative focusing on skill-building and knowledge sharing among team members.

Facts & Snacks: Held monthly, this initiative combines learning with leisure, offering bitesized information sessions accompanied by snacks.

External Communication Channels

LinkedIn Newsletter: Our monthly <u>LinkedIn</u> dispatch provides updates, insights, and highlights to our external stakeholders, mainly software developers, keeping them informed about technology's latest developments.

Social Media Educational Content: Shared 1-2 times a week, this content aims to educate our followers on industry trends, technological advancements, and other relevant topics.

Beyond Code: A weekly initiative that delves deep into the world of technology through the eyes of Anthill's employees, offering insights, and expert opinions.

Blog Articles: We regularly publish articles on various topics. Some recurring themes include "Why Bulgaria," which promotes the country as a tech hub, and "Behind Anthill," which offers a behind-the-scenes look at our operations. These articles are released 1-2 times a month.

Event Initiatives

After Hours: In collaboration with the Recursive (<u>The Recursive</u> is an independent community-born online media focused on the emerging tech and startup ecosystems in Central and Eastern Europe (CEE)), the <u>After Hours</u> monthly event offers a relaxed setting for networking, knowledge sharing, and collaboration.

Our diverse communication channels reflect our commitment to maintaining open lines of communication with all our stakeholders. Whether it is through newsletters, events, or educational content, we ensure that our community, both internal and external, remains informed, engaged, and connected.

4.4. Affiliations and Memberships with Business Associations

BESCO - The Bulgarian Entrepreneurial Association

Role and Contribution: As a long-standing member of <u>BESCO</u>, Anthill actively contributes to its mission of bridging the gap between startups, investors, the government, and other key stakeholders in the innovation sector.

Legislative Initiatives: Anthill supports and actively participates in several of BESCO's legislative initiatives, including:

- The establishment of the Variable Capital Company.
- The introduction of the Startup Visa, facilitating the entry and stay of non-EU startup founders.
- Advocacy for the Bulgarian Blue Card, aimed at attracting highly skilled non-EU workers.
- The development of Crowdfunding legislation to bolster alternative financing methods for startups and SMEs.

The American Chamber of Commerce in Bulgaria

Collaborative Endeavors: Being a member of <u>AmCham</u>, Anthill is part of a network of over 330 American, Bulgarian, and multinational companies operating in Bulgaria.

Engagement and Advocacy: Anthill actively participates in events and discussions initiated by the Chamber, focusing on economic growth, international and national policies, and socio-economic development. Our involvement ensures we stay abreast of global best practices and contribute to the broader business dialogue.

AHK Bulgaria - The German-Bulgarian Chamber of Industry and Commerce

Bilateral Business Relations: As a member of <u>AHK Bulgaria</u>, Anthill is at the forefront of fostering German-Bulgarian business relations. The Chamber serves as a vital platform for contacts, partnerships, and exchanges between German and Bulgarian enterprises.

Business Opportunities: Our affiliation with AHK Bulgaria opens doors to new business opportunities, collaborations, and insights into the German market. It also allows us to contribute to and benefit from the Chamber's initiatives aimed at enhancing bilateral trade and investment.

Bulgarian-Swiss Chamber of Commerce

Strengthening Bilateral Business Ties: Anthill's recent induction into the <u>Bulgarian-Swiss</u> <u>Chamber of Commerce</u> marks a significant step in bolstering business relations between Bulgaria and Switzerland. The Chamber acts as a crucial platform for facilitating interactions, partnerships, and knowledge exchange between enterprises from both countries.

Expanding Business Horizons: Our membership with the Bulgarian-Swiss Chamber of Commerce unlocks new avenues for business growth, collaborative ventures, and insights into the Swiss market. It positions us to actively participate in and gain from the Chamber's efforts to boost bilateral commerce and investment.

Fostering Educational Development: Anthill's engagement with the Bulgarian-Swiss Chamber of Commerce extends beyond business relations, aligning with our dedication to empowering individuals of all ages through lifelong learning. The Chamber's active role in integrating the Swiss dual education system into Bulgaria's vocational high-school education, particularly through the DOMINO project, resonates with our values of educational and personal development.

Central Eastern Europe Digital Coalition

Enhancing Digital Collaboration in Central Eastern Europe: Anthill is excited to be a part of the <u>CEE Digital Coalition</u>, a significant alliance of digital and technology organizations

across Central Eastern Europe. This coalition, initiated by the Digital Poland Association, focuses on accelerating the digital transformation of the region's economy and society. Anthill's membership aligns with our commitment to digital advancement, promoting investments in advanced technologies, and ensuring widespread access to digital services. By joining forces with this coalition, we are actively participating in shaping a unified digital strategy for the region, emphasizing digital competence, cybersecurity, and responsible data management.

Active Participation in Regional Digital Initiatives: The CEE Digital Coalition, established in September 2020, plays a crucial role in the digital development of the CEE region. Anthill actively contributes to the coalition's initiatives, including hosting educational events, engaging in policy consultations, and supporting the digital transformation of small and medium enterprises. Our involvement is a clear demonstration of our dedication to fostering a connected, secure, and digitally advanced Central Eastern Europe. This collaboration is further strengthened through the annual CEE Digital Summit, where we join other industry leaders and policymakers in driving forward the region's digital agenda.

Anthill's governance policies are deeply intertwined with our active participation in these esteemed associations and chambers. Through these affiliations, we not only enhance our business practices but also contribute to shaping a more collaborative and progressive business environment in Bulgaria and beyond.

4.5. Operational Efficiency and Employee Support

Upholding Anthill's Governance Excellence: Anthill's strategic relocation to Office X underscores our commitment to combining operational efficiency with strong support for our employees, reflecting our core principles of ethical management and responsible decision-making. This move transcends a mere change of address; it is a carefully considered decision that aligns with our stringent governance policies. By choosing Office X, renowned for its Class A status and sustainable building practices, we are not only optimizing our operational capabilities but also reinforcing our pledge to responsible corporate conduct. This relocation is a milestone in Anthill's ongoing journey, embodying our dedication to a future where operational efficiency, employee support, and adherence to sustainable, socially responsible governance practices are intricately woven into the fabric of our organizational ethos.

Efficient Employee Support and Communication with Anthill's Help Desk Ticketing System: Anthill's Help Desk Ticketing System streamlines support and communication, ensuring operational efficiency and timely assistance for our employees. The system,

accessible through a dedicated link and Anthill ID, is designed for easy navigation and prompt tracking of inquiries to our HR and IT teams.

Upon signing in, employees are directed to open a new ticket by selecting an appropriate help topic and detailing their inquiry. After submission, they receive an acknowledgment email for transparency and follow-up emails updating them on the progress. This system efficiently handles a variety of requests and issues, from IT troubles to HR queries, ensuring each is logged, tracked, and resolved promptly. Our goal is to maintain seamless communication and provide swift support, minimizing delays and enhancing overall employee satisfaction.

4.6. Transparency and Internal Communication

Anthill Intranet Portal: At Anthill, we understand the importance of transparent communication, easy access to company policies and processes, and fostering a culture of collaboration. To achieve these objectives, we have established our Intranet Portal, a centralized platform designed to enhance internal communication and provide employees with immediate access to essential company information.

- Accessing the Portal: The <u>Intranet Portal</u> is seamlessly integrated into our daily operations, ensuring that every team member can effortlessly access company policies, regulations, and processes. This transparency ensures that all employees, regardless of their role or tenure, are aligned with Anthill's values, objectives, and operational guidelines.
- Utilizing the Portal: Beyond just policy access, the portal serves as a hub for knowledge sharing and company updates. Whether company departmental news, project updates, or company-wide announcements, the Intranet Portal ensures that information flows smoothly across the organization. This centralized communication tool fosters a sense of unity, ensuring that all employees feel informed, engaged, and part of the Anthill family.

The Intranet Portal is not just a repository of information; it is a dynamic platform that evolves with our company's needs. As we introduce new policies, achieve milestones, or undergo organizational changes, the portal reflects these updates, ensuring real-time information dissemination. The portal comprehensively covers information regarding employee-related processes and topics, our company's delivery business model, operational models, and technology operations models. By providing a single source of truth, we eliminate ambiguities and ensure that all employees have a clear understanding of our company's direction, structure, and values.

Closing Reflections on Anthill's ESG Commitment

Anthill's dedication to Environmental, Social, and Governance (ESG) principles is more than a corporate obligation; it is a reflection of our core values and our vision for a sustainable future. Our comprehensive ESG policies underscore our commitment to not only meet but exceed industry standards, ensuring a positive impact on society, the environment, and our stakeholders. As we navigate the complexities of the modern business landscape, these policies serve as our guiding compass, ensuring that every decision we make aligns with our mission to foster a responsible, inclusive, and environmentally conscious business environment. We remain steadfast in our dedication to continuous improvement, always seeking ways to enhance our ESG initiatives and further solidify our role as industry leaders in sustainability and corporate responsibility.

Responsibility for ESG Policies at Anthill

Drafting and Formulation:

Responsible for the drafting and formulation of Anthill's ESG policies:

Valeria Djukic, Operations Lead

Review and Approval:

Final review and approval were undertaken by Anthill's C-level management:

Georgi Gerginov, Chief Executive Officer

Andrey Bachvarov, Chief Business Development Officer

Momchil Ivanov, Chief Legal and Procurement Officer

Teodora Lazarova, Chief People Officer

Kiril Kaykov, Chief Marketing Officer

The top-tier oversight guarantees that our ESG policies are in harmony with Anthill's broader strategic vision and corporate ethos.

Review version:

04.12.2023