



CGPH GROUP CODE OF CONDUCTS

Document ID	CGPH-POL-002
Version	2.0
Policy Owner	Group Legal & Compliance
Approved by	Director of CGPH Group Ltd.
Applies to	All CGPH Group Companies
Classification	Internal Group Policy
Effective Date	July 1, 2026
Review Cycle	Annual

1. Introduction

This Code of Conduct establishes the standards of professional behaviour expected from every individual acting for or on behalf of CGPH Group Ltd. and its subsidiaries.

The purpose of this Code is to ensure that all business activities are conducted with professionalism, integrity, accountability and respect for applicable laws, regulations and internal policies.

Every director, officer, employee, consultant, contractor, advisor and representative of the Group is expected to understand and comply with this Code.

The Code complements the Group Code of Ethics and shall be read together with all other Group policies.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail:info@cgph.info



2. Scope

This Code applies to every company belonging to the CGPH Group and to every person acting on behalf of a Group Company, regardless of jurisdiction, contractual status or seniority.

The standards contained in this Code apply during working hours, while representing the Group externally, during business travel, at conferences and events, when communicating with clients and counterparties and whenever an individual's conduct may reasonably be associated with the Group.

3. Professional Behaviour

Personnel shall conduct themselves in a manner consistent with the reputation and standards of the Group.

Every individual is expected to perform their duties with competence, diligence and professionalism.

Professional judgement shall always prevail over personal interests.

Behaviour likely to damage the reputation of the Group must be avoided, whether within or outside the workplace.

Courtesy, respect and professionalism are expected in all interactions with colleagues, clients, investors, suppliers, regulators and business partners.

4. Integrity

Personnel shall act honestly and in good faith in every business activity.

Information must never be manipulated, concealed or intentionally presented in a misleading manner.

Promises or commitments may only be made where there is appropriate authority and a reasonable basis for doing so.

Any attempt to obtain an improper personal or commercial advantage is strictly prohibited.

Personnel shall never misuse their position within the Group for personal benefit.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail: info@cgph.info



5. Compliance with Laws

Every individual is personally responsible for complying with applicable laws, regulations, professional obligations and internal policies.

Ignorance of applicable legal requirements does not excuse non-compliance.

Whenever uncertainty exists regarding the legality or appropriateness of a particular action, guidance shall be sought from Group Legal & Compliance before proceeding.

No commercial objective may justify unlawful or unethical conduct.

6. Relationships with Clients

Personnel shall treat every client fairly, professionally and respectfully.

Information provided to clients must always be accurate, complete and not misleading.

Services shall be explained clearly, including assumptions, conditions, limitations and risks where appropriate.

Personnel shall avoid unrealistic expectations regarding transactions or outcomes.

The interests of clients shall always be considered with honesty and professional independence.

7. Relationships with Colleagues

The Group promotes a respectful and collaborative working environment.

Every individual shall contribute positively to teamwork, mutual respect and open communication.

Harassment, discrimination, intimidation, bullying or abusive behaviour are not tolerated.

Differences of opinion shall always be expressed professionally and respectfully.

8. Confidentiality

Personnel are entrusted with confidential information belonging to clients, counterparties and the Group.

Such information shall be protected at all times.

Confidential information shall only be disclosed where authorized or legally required.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail:info@cgph.info



Personnel shall take appropriate precautions to prevent unauthorized access to confidential information. Confidentiality obligations continue after the end of the employment or contractual relationship.

9. Conflicts of Interest

Personnel shall avoid situations that create actual, potential or perceived conflicts between personal interests and those of the Group.

Any conflict shall be disclosed promptly to Group Legal & Compliance.

Business decisions shall never be influenced by personal relationships, financial interests or external activities.

Personnel shall not participate in decisions where their impartiality may reasonably be questioned.

10. Gifts and Hospitality

Business gifts and hospitality shall always remain reasonable, proportionate and transparent.

Personnel shall neither offer nor accept gifts capable of influencing business decisions or creating the appearance of improper influence.

Cash gifts or equivalent benefits are prohibited.

Whenever doubt exists regarding the appropriateness of a gift or hospitality, prior guidance shall be obtained from Group Legal & Compliance.

11. Protection of Group Assets

Personnel are responsible for safeguarding the assets of the Group.

Company property shall only be used for legitimate business purposes.

Information systems, equipment, financial resources, intellectual property and confidential documents shall be protected against misuse, loss or unauthorized disclosure.

Wasteful or irresponsible use of Group resources shall be avoided.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail:info@cgph.info



12. Information Security

Personnel shall comply with all information security requirements established by the Group.

Passwords, authentication credentials and access rights shall be protected and never shared.

Electronic devices shall be used responsibly.

Unauthorized software or systems shall not be installed or used.

Suspicious emails, cybersecurity incidents or unauthorized access attempts shall be reported immediately.

13. Artificial Intelligence and Digital Tools

Artificial intelligence and digital technologies may only be used responsibly and in accordance with applicable Group policies.

Personnel shall not upload confidential, privileged or personal information into unauthorized external systems.

Outputs generated through artificial intelligence shall always be reviewed before being relied upon or shared externally.

Professional judgement remains the responsibility of the individual using such tools.

14. External Communications

Only authorized persons may speak on behalf of the Group.

Personnel shall ensure that any external communication is accurate, professional and consistent with the Group's values.

Public statements shall not disclose confidential information or create legal, regulatory or reputational risks.

Media enquiries shall be referred to the appropriate authorized function.

15. Social Media

Personnel shall use social media responsibly.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail:info@cgph.info



Online behaviour shall reflect the professionalism expected by the Group.

Personnel shall avoid publishing confidential information, making misleading statements or engaging in conduct that could damage the reputation of the Group.

Personal opinions shall not be presented as official positions of the Group unless expressly authorized.

16. Financial Crime Prevention

Personnel shall remain vigilant against fraud, money laundering, terrorist financing, sanctions violations and other financial crimes.

Appropriate due diligence procedures shall always be followed.

Suspicious behaviour, unusual transactions or inconsistencies shall be reported promptly.

Personnel shall cooperate fully with compliance reviews and internal investigations.

17. Record Keeping

Business records shall be accurate, complete and maintained in accordance with applicable legal requirements and Group policies.

Documents shall not be altered, destroyed or concealed without proper authorization.

Records shall accurately reflect the underlying facts and business activities.

18. Speaking Up

Personnel are encouraged to report concerns regarding misconduct, unethical behaviour or possible breaches of law or internal policies.

Reports made in good faith will be treated confidentially and investigated appropriately.

Retaliation against individuals who raise concerns in good faith is strictly prohibited.

19. Responsibilities

Every individual is responsible for understanding and complying with this Code.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail:info@cgph.info



Managers are expected to lead by example and promote a culture of professionalism, integrity and compliance.

Group Legal & Compliance is responsible for providing guidance on the interpretation and application of this Code.

20. Breaches of the Code

Failure to comply with this Code may result in disciplinary action, termination of employment or engagement, contractual remedies, reporting to competent authorities or other measures considered appropriate by the Group.

The seriousness of any breach shall be assessed on the basis of the circumstances, the level of responsibility of the individual involved and the potential impact on the Group, its clients and its stakeholders.

21. Review of the Code

This Code shall be reviewed periodically by Group Legal & Compliance to ensure that it remains appropriate, effective and consistent with changes in the Group's activities, legal requirements and regulatory expectations.

Material amendments shall be approved by the Board of Directors of CGPH Group Ltd.

22. Final Provisions

Compliance with this Code is a condition of acting for or on behalf of any company belonging to the CGPH Group.

Every individual is expected to uphold the standards contained in this Code and to contribute actively to maintaining a culture of integrity, professionalism and accountability throughout the Group.

Approved by:

Director of CGPH Group Ltd.

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail:info@cgph.info



Date: July 1, 2026

Signature: _____

A handwritten signature in blue ink, appearing to read "Kolyo Boichev", is written over a horizontal line.

Name: Kolyo Boichev

Title: Director

CGPH GROUP LTD

The Shard, 32 London Bridge St, London, London, England, SE1 9SG
phone number: +44 204 572 3910 www.cgph.info e-mail: info@cgph.info