



## CGPH GROUP CORPORATE SOCIAL RESPONSIBILITY POLICY

<b>Document ID</b>	CGPH-POL-011
<b>Version</b>	2.0
<b>Policy Owner</b>	Group Legal & Compliance
<b>Approved by</b>	Director of CGPH Group Ltd.
<b>Applies to</b>	All CGPH Group Companies
<b>Classification</b>	Internal Group Policy
<b>Effective Date</b>	July 1, 2026
<b>Review Cycle</b>	Annual

### 1. Introduction

CGPH Group Ltd. believes that long-term business success is closely linked to responsible corporate conduct. The Group recognises that its activities have an impact on clients, employees, investors, counterparties, suppliers, local communities and the broader financial ecosystem.

Corporate Social Responsibility is an integral part of the Group's governance framework and reflects its commitment to conducting business ethically, responsibly and sustainably.

The Group seeks to create long-term value not only through commercial success, but also through responsible decision-making, sound governance, environmental awareness and meaningful engagement with stakeholders.

This Policy establishes the principles that guide the Group's approach to Corporate Social Responsibility across all jurisdictions in which it operates.

#### CGPH GROUP LTD

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



This Policy shall be read together with the Group Code of Ethics, Code of Conduct, Risk Management Policy, Business Continuity Policy and all other relevant governance documents.

## **2. Purpose**

The purpose of this Policy is to establish a common framework for responsible business conduct throughout the Group.

The Policy seeks to:

- a) Promote ethical business practices.
- b) Support sustainable long-term growth.
- c) Strengthen relationships with stakeholders.
- d) Encourage responsible environmental practices.
- e) Promote respect for human rights and diversity.
- f) Support good corporate governance.
- g) Protect the reputation of the Group.
- h) Contribute positively to the communities in which the Group operates.

## **3. Scope**

This Policy applies to every company belonging to the CGPH Group and to every director, officer, employee, consultant, contractor, advisor and representative acting on behalf of a Group Company.

The principles contained in this Policy shall be considered in business decisions, strategic planning, client relationships, procurement activities, employment practices and all other aspects of the Group's operations.

## **4. Commitment to Responsible Business**

The Group is committed to conducting its activities with integrity, fairness and accountability.

Commercial success shall be pursued in a manner that respects applicable laws, recognised ethical standards and the legitimate interests of stakeholders.

**CGPH GROUP LTD**

**The Shard, 32 London Bridge St, London, London, England, SE1 9SG**  
phone number: +44 204 572 3910 [www.cgph.info](http://www.cgph.info) e-mail:info@cgph.info



The Group seeks to balance commercial objectives with responsible corporate citizenship and sustainable value creation.

## **5. Corporate Governance**

Strong corporate governance forms the foundation of responsible business conduct.

The Group is committed to maintaining effective governance structures, transparent decision-making processes and appropriate internal controls.

Accountability, integrity and professional independence shall guide all significant business decisions.

The Group shall promote compliance with applicable legal and regulatory requirements across all jurisdictions in which it operates.

## **6. Ethical Business Conduct**

The Group expects the highest standards of honesty, integrity and professionalism from every individual acting on its behalf.

Business relationships shall be conducted fairly, transparently and in good faith.

The Group does not tolerate corruption, bribery, fraud, money laundering, discrimination or any other form of unethical or unlawful conduct.

Personnel are expected to uphold the principles contained in the Group Code of Ethics and Code of Conduct at all times.

## **7. Human Rights**

The Group respects internationally recognised human rights and seeks to conduct its business in a manner consistent with dignity, equality and respect for all individuals.

The Group opposes forced labour, child labour, human trafficking and all forms of exploitation.

Business relationships shall be conducted with organisations that share comparable standards of responsible conduct wherever reasonably practicable.

**CGPH GROUP LTD**

**The Shard, 32 London Bridge St, London, London, England, SE1 9SG**  
phone number: +44 204 572 3910 [www.cgph.info](http://www.cgph.info) e-mail: info@cgph.info



## **8. Employees and Workplace**

The Group is committed to providing a professional, respectful and inclusive working environment.

Personnel shall be treated fairly and with respect.

The Group promotes equal opportunities, diversity, inclusion and merit-based professional development.

Harassment, discrimination, intimidation and workplace bullying shall not be tolerated.

The Group encourages continuous learning, professional development and employee wellbeing.

## **9. Clients and Business Partners**

The Group seeks to build long-term relationships based upon trust, professionalism and transparency.

Clients shall be treated fairly and respectfully.

Business partners shall be selected using objective commercial criteria while taking into account integrity, reputation and responsible business practices.

The Group encourages responsible conduct throughout its business relationships.

## **10. Environmental Responsibility**

The Group recognises the importance of environmental sustainability.

Although the Group's activities generally have a limited direct environmental impact compared with industrial sectors, reasonable efforts shall be made to minimise environmental footprint wherever practicable.

The Group encourages responsible use of energy and natural resources.

Digital documentation and efficient business processes shall be promoted where appropriate.

Waste reduction and responsible resource management shall be encouraged throughout the organisation.

## **11. Community Engagement**

**CGPH GROUP LTD**

**The Shard, 32 London Bridge St, London, London, England, SE1 9SG**  
phone number: +44 204 572 3910 [www.cgph.info](http://www.cgph.info) e-mail: info@cgph.info



The Group recognises the importance of contributing positively to the communities in which it operates. Where appropriate, the Group may support charitable initiatives, educational programmes, professional development, financial literacy, cultural activities and community projects consistent with its values and strategic objectives.

Community engagement shall be conducted transparently and in accordance with applicable legal and regulatory requirements.

## **12. Responsible Business Relationships**

The Group encourages suppliers, consultants, intermediaries and other business partners to maintain high standards of ethical conduct.

Relationships shall be established on the basis of integrity, professionalism, transparency and mutual respect.

The Group reserves the right to reconsider relationships where serious ethical, legal or reputational concerns arise.

## **13. Sustainability**

The Group recognises that sustainable business practices contribute to long-term resilience and value creation.

Strategic decisions should consider economic, environmental, social and governance factors where appropriate.

The Group supports continuous improvement in sustainability practices while recognising the evolving nature of ESG standards and stakeholder expectations.

## **14. Compliance and Accountability**

Corporate Social Responsibility requires the active participation of every individual acting on behalf of the Group.

**CGPH GROUP LTD**

**The Shard, 32 London Bridge St, London, London, England, SE1 9SG**  
phone number: +44 204 572 3910 [www.cgph.info](http://www.cgph.info) e-mail: info@cgph.info



Personnel are expected to comply with this Policy and to conduct themselves consistently with the Group's ethical standards.

Managers shall promote responsible decision-making and encourage responsible business practices within their respective areas of responsibility.

### **15. Reporting Concerns**

Individuals are encouraged to report concerns regarding conduct inconsistent with this Policy.

Reports shall be handled in accordance with the Group Whistleblowing Policy and other applicable reporting procedures.

The Group shall not tolerate retaliation against individuals who report concerns in good faith.

### **16. Training and Awareness**

The Group shall promote awareness of responsible business practices through appropriate communication and training initiatives.

Personnel are encouraged to remain informed regarding developments relating to corporate responsibility, sustainability, governance and ethical business conduct.

Managers shall support a culture in which responsible decision-making forms part of everyday business activities.

### **17. Responsibilities**

The Board of Directors is responsible for approving this Policy and overseeing the Group's Corporate Social Responsibility framework.

Senior Management shall promote the implementation of responsible business practices throughout the Group.

Managers shall integrate the principles contained in this Policy into their business activities and decision-making processes.

**CGPH GROUP LTD**

**The Shard, 32 London Bridge St, London, London, England, SE1 9SG**  
phone number: +44 204 572 3910 [www.cgph.info](http://www.cgph.info) e-mail: info@cgph.info



Every individual acting on behalf of the Group shares responsibility for contributing to the Group's commitment to responsible corporate conduct.

Group Legal & Compliance shall support the implementation of this Policy and provide guidance regarding its interpretation where appropriate.

### **18. Breaches of this Policy**

Failure to comply with this Policy may expose the Group to legal, regulatory, operational or reputational risks.

Breaches may result in disciplinary action, contractual consequences or other measures considered appropriate by the Group.

Serious misconduct involving unethical or unlawful behaviour may also result in reporting to competent authorities where required by applicable law.

### **19. Review**

This Policy shall be reviewed periodically to ensure that it remains consistent with the Group's activities, governance framework, recognised international standards and applicable legal and regulatory requirements.

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

### **20. Final Provisions**

Corporate Social Responsibility is an essential component of CGPH Group's identity and long-term strategy.

The Group believes that sustainable success is achieved through responsible leadership, ethical business conduct, sound governance and constructive engagement with all stakeholders.

By integrating the principles contained in this Policy into its daily activities, CGPH Group seeks to create lasting value for its clients, employees, shareholders, business partners and the communities in

**CGPH GROUP LTD**

**The Shard, 32 London Bridge St, London, London, England, SE1 9SG**  
phone number: +44 204 572 3910 [www.cgph.info](http://www.cgph.info) e-mail:info@cgph.info



which it operates, while maintaining the highest standards of professionalism, integrity and corporate responsibility.

Approved by:

Director of CGPH Group Ltd.

Date: July 1, 2026

Signature: \_\_\_\_\_

Name: Kolyo Boichev

Title: Director

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

**CGPH GROUP LTD**

**The Shard, 32 London Bridge St, London, London, England, SE1 9SG**  
phone number: +44 204 572 3910 [www.cgph.info](http://www.cgph.info) e-mail:info@cgph.info