



CODE OF CONDUCT FOR BUSINESS PARTNERS

How We Work with Our Business Partners

Last Review: 6/04/2026



1. Purpose and Scope

This Code of Conduct (“Code”) sets out the mandatory ethical, legal, social, environmental, and operational standards required from all business partners (“Partners”) of Nemetschek Bulgaria. It applies to suppliers, subcontractors, consultants, contractors, technology providers, outsourcing partners, and all entities acting on behalf of or in collaboration with Nemetschek Bulgaria.

The principles herein are grounded in internationally recognized instruments, including the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and other frameworks referenced in our internal policies, such as Human Rights & Ethics Policy, Whistleblowing Policy etc.

Partners must ensure that equivalent standards are implemented within their own supply chains and must contractually require their subcontractors and affiliates to comply with this Code.

2. General Legal Compliance

Partners shall comply with all applicable laws, regulations, directives, and binding industry requirements in every jurisdiction in which they operate.

Compliance obligations include, but are not limited to:

- Labor, employment, and social protection
- Health and safety regulations
- Taxation and financial reporting
- Competition and antitrust laws
- Anti-corruption and anti-bribery laws
- Data protection and privacy laws (e.g., GDPR)
- Environmental protection legislation

Partners are responsible for maintaining appropriate internal controls, procedures, and training to ensure continued compliance.

3. Ethical Business Conduct

Anti-Corruption and Anti-Bribery

Partners must prohibit all forms of bribery, corruption, extortion, embezzlement, and improper influence. This includes direct or indirect offering, promising, granting, requesting, or accepting any benefit intended to influence a business decision.

Conflicts of Interest

Partners must avoid situations where personal or financial interests conflict with company interests. Any actual or potential conflict must be reported to Nemetschek Bulgaria without delay.

Fair Competition

Partners must comply with all applicable competition and antitrust rules. They must not engage in anti-competitive agreements, price fixing, market manipulation, bid-rigging, or abuse of market dominance.

Responsible Business Practices

Partners shall maintain accurate business records, comply with financial integrity standards, and avoid money-laundering or terrorism-financing activities.

4. Human Rights and Labor Standards

These requirements reflect the standards set in Nemetschek Bulgaria's *Human Rights & Ethics Policy*.

Non-Discrimination and Equal Opportunity

Partners shall provide equal opportunities and prohibit discrimination based on any characteristic protected by law.

Dignity and Respect

Partners must maintain a workplace free from harassment, intimidation, bullying, retaliation, or degrading treatment.

Freedom of Association & Collective Bargaining

Partners shall respect employees' rights to form or join trade unions and engage in collective bargaining in accordance with applicable laws.

Prohibition of Forced, Bonded, and Child Labor

Partners shall not use forced, bonded, trafficked, or child labor in any form. The minimum working age must comply with applicable legislation and international standards.

Fair Working Conditions

Partners must ensure compliance with legal standards on wages, working hours, overtime, rest periods, social protections, and benefits.

Health & Safety

Partners must provide a healthy and safe working environment, implement risk-prevention measures, and comply with occupational health and safety regulations.

5. Environmental Responsibility (ESG Alignment)

Nemetschek Bulgaria is committed to conducting its operations in a manner that minimizes adverse environmental impacts and complies with all applicable environmental laws, regulations, and permit requirements. We expect Partners to adhere to **the same standards** and ensure environmental compliance throughout their operations.

Both Nemetschek Bulgaria and its Partners shall strive to:

- a) use natural resources responsibly and efficiently;
- b) reduce energy consumption and greenhouse-gas emissions;
- c) minimize waste generation and prioritize prevention, reduction, reuse, and recycling;
- d) promote sustainable practices in line with recognized environmental management principles.

Where appropriate to the nature and scale of operations, Nemetschek Bulgaria and its Partners are encouraged to implement or maintain environmental management systems aligned with international standards to continually improve environmental performance.

6. Digital Security and ICT Operational Resilience (DORA-Aligned)

Nemetschek Bulgaria maintains governance, technical, and organizational measures designed to ensure the resilience, security, and reliability of its information and communication technology (ICT) systems, in line with recognized industry standards and the principles of the EU Digital Operational Resilience Act (DORA). Partners supporting or enabling ICT-dependent services are required to maintain equivalent standards of ICT risk management and operational resilience.

ICT Risk Management

Both Nemetschek Bulgaria and its Partners shall maintain documented processes to identify, assess, mitigate, monitor, and report ICT-related risks, including risks arising from third-party dependencies.

Cybersecurity Controls

As Nemetschek Bulgaria had already done, its Partners are also required to implement proportionate and effective cybersecurity controls, including but not limited to:

- a) identity and access management;
- b) logical and physical access restrictions;
- c) network and infrastructure protection;
- d) secure system configuration and hardening;
- e) security monitoring, logging, and event detection;
- f) vulnerability identification, patching, and remediation;
- g) staff awareness and security training.

Business Continuity and Operational Resilience

Nemetschek Bulgaria maintains Business Continuity Plans (BCP) and Disaster Recovery Plans (DRP) appropriate to its operations and critical services. Partners shall maintain proportionate and tested BCP and DRP measures to ensure continued service delivery and rapid recovery from disruptions.

ICT Incident Management and Notification

Partners must notify Nemetschek Bulgaria without undue delay of any ICT, cybersecurity, or operational incident that could compromise service availability, integrity, confidentiality, or continuity. Incident response and recovery activities shall be coordinated where required.

7. GDPR

Nemetschek Bulgaria does not primarily process personal data as part of its core business activities, but when it does – it is in compliance with applicable data protection and privacy legislation, including the EU General Data Protection Regulation (GDPR), and has implemented

appropriate technical and organizational safeguards to protect personal data. All the mechanisms are described in the internal company GDPR Policy.

Partners that process, access, or otherwise handle personal data on behalf of or in connection with Nemetschek Bulgaria shall comply with all applicable data protection laws and maintain **equivalent standards of data protection and information security**.

Lawful Processing

Partners shall ensure that personal data is processed lawfully, fairly, and transparently, and only for specified, explicit, and legitimate purposes.

Data Security and Confidentiality

Partners must implement appropriate measures to protect personal data against unauthorized or unlawful processing, accidental loss, destruction, or damage, including access controls, encryption where appropriate, and secure data handling procedures.

Sub-processing and Third Parties

Partners shall not engage sub-processors involving personal data without appropriate safeguards and, where applicable, prior written authorization. All sub-processors must be bound by equivalent data protection obligations.

Data Breach Notification

Partners must notify Nemetschek Bulgaria without undue delay upon becoming aware of any personal data breach that affects or may affect data processed in connection with the business relationship.

Data Subject Rights

Partners must support the fulfillment of data-subject rights requests and cooperate with Nemetschek Bulgaria to ensure compliance with statutory response timelines.

8. Responsible Supply Chain Management

Partners must implement due-diligence procedures to ensure responsible and ethical sourcing of goods and materials.

Partners are responsible for ensuring that their subcontractors and sub-suppliers comply with this Code or equivalent standards.

9. Monitoring, Verification, and Corrective Measures

Right to Assess Compliance

Nemetschek Bulgaria reserves the right to verify Partner compliance through assessments, documentation requests, remote or on-site audits, or third-party verifications.

Obligation to Cooperate

Partners must provide timely and accurate information, documentation, and access to facilities or personnel as reasonably required.

Corrective Actions

When violations occur, Partners must take immediate corrective measures and provide evidence of remediation.

Consequences of Non-Compliance

Material breaches, repeated violations, or failure to implement corrective actions may result in contract suspension, termination, or removal from the Partner list.

10. Whistleblowing and Protection for Reporting Persons

This section reflects Nemetschek Bulgaria's internal Whistleblowing Policy and the requirements of Directive (EU) 2019/1937.

Reporting Channels

Partners must maintain secure and accessible channels that allow employees and stakeholders to report concerns related to misconduct, legal violations, or breaches of this Code.

Confidentiality

The identity of reporting persons must be protected. Information may only be disclosed when required by law.

Non-Retaliation

Partners shall prohibit retaliation in any form against individuals who report concerns in good faith.

Investigation and Follow-Up

Partners must ensure timely acknowledgement, impartial investigation, and appropriate follow-up to all reports.

Notification to Nemetschek Bulgaria

If a report concerns or may impact the services provided to Nemetschek Bulgaria, the Partner must notify us promptly.

11. Governance and Amendments

This Code is administered by Nemetschek Bulgaria's Governance, Risk and Compliance function.

Nemetschek Bulgaria may modify or update this Code at any time to reflect legal changes, best practices, or internal policy updates.

Partners are responsible for ensuring they remain informed of the current version of the Code and maintain full compliance.