

## **Sustainability policy of MTS Globe Bulgaria**

## **Sustainability management & legal compliance**

### Sustainability commitment

MTS Bulgaria and its subsidiary company leadership is wholly committed to the company's sustainability performance and endorses the company's sustainability mission statement and policy.

We will use the Travelife platform to report on our sustainability progress and to monitor and evaluate progress. We are committed to publicly communicating our sustainability performance by means of the Travelife report every two years.

### Sustainability management & legal compliance

MTS Globe Bulgaria its subsidiary company commits to continuous improvement of sustainability practices, including the ongoing monitoring and evaluation of our sustainability policy, with dedicated personnel and resources to achieve our sustainability goals.

MTS Globe Bulgaria and its subsidiary company follows all local, regional, national, and international regulations as they relate to human resources, human rights, children's rights, land rights, environmental management, wildlife, and land use. We follow a strict Code of Ethics, including a zero-tolerance policy for corruption, bribery, forced labor, and discrimination.

## **Internal management: social policy & human rights**

### Employees

- We recognize that our employees are our biggest asset for delivering meaningful travel experiences to our customers. Therefore, we maintain a clear human resource policy to ensure:
  - Legal compliance in all regards
  - A safe, healthy, and welcoming workplace
  - Fair contract conditions including fair compensation
  - Training opportunities including trainings on topics of sustainability, sexual harassment and exploitation in the workplace and in the industry
  - Participation in the sustainability planning activities
  - Inclusion and equal opportunity for all employees, particularly with regard to compensation, promotion, distribution of benefits, and professional development opportunities.

## **Internal management: environment**

### Environmental management of office operations

- MTS Globe Bulgaria and its subsidiary company is committed to managing environmental impact as an integral part of our operations. It is our policy to assure the environmental integrity of our processes and products at all times by:
- Continuously seeking opportunities to improve our environmental performance by establishing objectives

and targets, measuring progress, and reporting our results, including but not limited to energy, water, paper, and carbon.

- Practising a waste hierarchical approach to always reduce, reuse, and recycle commodities and products instead of waste, particularly waste to landfill.
- Promoting participation and communicating our commitment to responsible environmental management by promoting environmental responsibility amongst our employees and stakeholders and soliciting input from them to better achieve our environmental goals.
- Minimising pollution including light, noise, and any soil, water, or air contaminants, and avoiding use of any toxic or hazardous substances.

### Carbon management of office operations

- MTS Globe Bulgaria and its subsidiary company is committed to reducing our carbon footprint and endeavours to reduce the amount we travel as much as possible by:
  - Reduce the amount we travel as much as possible
  - Monitoring and measuring carbon footprint with the aim to reduce as much as possible and offset remaining amounts.
  - Encouraging remote work whenever possible, and when it is not possible, making it easier for employees to limit their carbon footprint by use of eco modes of transportation.
  - Installing energy efficient equipment and appliances where it is possible

### Land use

- Our offices are located in an urban area and abides by all local land use laws, respects local cultural and natural resources in our business operations, and favours sustainable architecture and design.

### **General suppliers policy**

- Our company is committed to sourcing its services responsibly, avoiding harmful impacts on society, culture and nature as much as possible. We expect the same level of engagement and commitment from our suppliers.
- We prefer to work with partners that share the company's commitment towards sustainability. This means that we prefer partners that have a written sustainability statement as an integral part of their business policy and/or a clear sustainability policy in place.
- We prefer to work with suppliers in the destinations that are locally owned or managed, use local and seasonal products and services and benefit the local community by hiring locally and equitably and by providing fair working conditions.
- Whenever possible, MTS Globe Bulgaria and its subsidiary company prefers to select partner companies that comply with tourism-specific, internationally recognized (GSTC-accredited) certifications, or other sustainability certifications like B Corp or ISO.
- MTS Globe Bulgaria and its subsidiary company expects its suppliers to adhere to a Code of Conduct, that includes the following responsible business practices:

- Complying with all local, regional, national and international regulations
  - Respecting all human rights including labour rights, children's rights, and women's rights
  - Committing to fair employment conditions
  - Following anti-corruption, anti-bribery, anti-extortion, and anti-discrimination policies
  - Protecting children from (sexual) exploitation through tourism
  - Protecting the environment and natural resources
  - Acting in the best interest of local communities
  - Protecting the interests of MTS Globe Bulgaria and its subsidiary company
- Following a zero-tolerance policy, MTS Globe Bulgaria and its subsidiary company will immediately terminate any relationships with suppliers that violate our policies, specifically through acts of bribery, corruption, discrimination, and violation of human rights.
  - MTS Globe Bulgaria and its subsidiary company actively collaborates with suppliers to improve their sustainability performance. We encourage our suppliers to continuously learn about sustainability and provide/support this learning whenever possible.
  - MTS Globe Bulgaria and its subsidiary company maintains open lines of communication with our suppliers and partners and encourage feedback from our stakeholders at any time and on any topic, particularly sustainability.

### **Inbound partner agencies**

- MTS Globe Bulgaria and its subsidiary company only works with partner agencies that adhere to the company's Code of Conduct/Code of Ethics.
- In the entire process of developing and operating our travel packages, MTS Globe Bulgaria and its subsidiary company expect partner agencies to act in the best interests of the surrounding communities and environment as well as our guests.
- MTS Globe Bulgaria and its subsidiary company provide partner agencies opportunities for sustainability learning and management, including free access to the Travelife online learning and reporting platform.

## **Transport**

- MTS Globe Bulgaria and its subsidiary company only works with transport providers that adhere to the company's Code of Conduct.
- When selecting transport for guests and business related travel, MTS Globe Bulgaria and its subsidiary company commit to choosing the most environmentally friendly options available for travelling to, from, and within the destination – taking into consideration distance, price, route, and comfort.
- MTS Globe Bulgaria and its subsidiary company have implemented clear guidelines for reducing GHG emissions from transport and selecting the most environmentally friendly transport options, including the following measures:
  - Preferring ground transport over air transport for short-haul travel destinations
  - Avoiding in-destination flights as much as possible
  - Using appropriate vehicle sizes for group sizes and purchasing most efficient vehicles available
  - Training drivers on eco-driving techniques

## **Accommodations**

- MTS Globe Bulgaria and its subsidiary company only works with accommodations that adhere to the company's Code of Conduct.
- In the accommodation selection process, we consider the sustainability practices of an accommodation by taking into account their sustainability management and social and environmental footprint.
- MTS Globe Bulgaria favours the selection of accommodations that respect and protect land use, as well as respectfully highlight elements of local architecture, customs and traditions

## **Activities & Excursions**

- MTS Globe Bulgaria and its subsidiary company only works with excursion providers that adhere to the company's Code of Conduct.
- All excursions and activities run by or on behalf of MTS Globe Bulgaria and its subsidiary company respect local customs, traditions, cultural integrity, and natural resources.
- We commit to not offering any excursions that harm humans, wildlife, environment, or natural resources such as water and energy.
- We give preference to excursions and activities that benefit local communities, respect animal welfare and

support environmental protection.

- MTS Globe Bulgaria and its subsidiary company has clear guidelines/Codes of Conduct in place for environmentally and culturally sensitive excursions offered by or on behalf of the company. These guidelines are actively communicated to guests as well as distributed and implemented by excursion providers and guides.

### **Tour leaders, local representatives, and guides**

- We commit to hiring qualified local guides, porters, drivers or other local staff, paying them living wages and providing safe and fair working conditions. We expect the same from our suppliers that are hiring local staff on behalf of MTS Globe Bulgaria and its subsidiary company .
- MTS Globe Bulgaria and its subsidiary company understands that guides are the intermediaries between the guests and the socio-cultural and environmental context of the destination, conveying the appropriate behaviour to them. Therefore, we make sure that all guides hired by or leading tours on behalf of the company are trained regularly and knowledgeable in the sustainability topics of the destination.
- Our guides are specifically trained on the critical issue of sexual exploitation of children in tourism.
- We provide guides with learning opportunities on sustainability topics including providing free access to the Travelife online learning platform.

### **Destinations**

#### Sustainable destinations

- MTS Globe Bulgaria and its subsidiary company aims to send visitors to secondary or lesser-known tourist areas to avoid overtourism.
- MTS Globe Bulgaria and its subsidiary company does not support destinations that have a questionable human rights track record.

#### Environmental stewardship in destinations

- MTS Globe Bulgaria and its subsidiary company commits to environmental stewardship in the destinations in which we operate by:
  - Ensuring natural resources remain intact
  - Educating guests about the principles of responsible travel and responsible visitor behaviour

## **Customer communication and protection**

### Privacy

- Our customer protection is our priority. Therefore, we maintain a clear privacy policy to ensure
  - Legal compliance in all regards
  - Customers and their data are protected
  - Customers know how their information is being used

### Marketing and communication

- MTS Globe Bulgaria and its subsidiary company strives to be truthful in all situations and at all times. We offer products and services that do what we claim in our communications.
- We honour our explicit and implicit commitments and promises.
- We are anti-greenwashing and stand behind our sustainability claims 100%.
- We endeavour to be inclusive and representative in our marketing, and to always take into account cultural, religious, and ethnic sensitivities.

### Sustainability communication

- Customers are informed about the social and environmental impact of their journey, and are educated about the sustainable choices they can make, including transparent communication on:
  - Certified accommodations
  - Activities and excursions that benefit the local communities and environmental protection
  - Responsible shopping and illegal souvenirs

### Customer experience

- The company aims for all customer experiences to be positive, and follows strict health and safety, marketing, and excursion policies to ensure customer satisfaction. These policies cover specific topics of (but not limited to):
  - Health and safety
  - Emergency procedures
  - Privacy
  - Group numbers

- Transport
  - Shopping
  - Sexual exploitation
  - Children in tourism
  - Satisfaction and complaints
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- MTS Globe Bulgaria and its subsidiary company maintains open lines of communication with our customers and encourages feedback at any time and on any topic, particularly sustainability.

### **Contact / Responsible person**

All staff are responsible for the ownership and undertaking of this policy.

All staff are responsible for the promotion and implementation of this sustainability policy within their departments.

The implementation of this policy will be lead by the Sustainability Coordinator, Stefan Topuzov, who can be reached at [stefan.topuzov@mtsglobe.com](mailto:stefan.topuzov@mtsglobe.com).