



United Nations
Global Compact

We thank you for your time spent taking this survey.
Your response has been recorded.

Below is a summary of your responses

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CEO Statement of Continued Support

To our stakeholders,

I am pleased to confirm that the company reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment, and Anti-Corruption.

In this annual Communication on Progress, we disclose our continuous efforts to integrate the Ten Principles into our business strategy, culture, and daily operations, and contribute to United Nations goals, particularly in the Sustainable Development Goals.

Sincerely yours,

S1. Please complete the following information:

CEO/Highest-level executive name:

Kiril Markovski

CEO/Highest-level executive full title:

CEO

Company name:

Overgas Mrezhi

S2. Please confirm:

- I am the CEO or highest-level executive.
- I have received permission to sign on behalf of the CEO or highest-level executive.

S2.1. If applicable, form completed on behalf of the CEO or highest-level executive by:

Darinka Georgieva

R1. How will you complete the 2023 CoP reporting requirement?

- Complete the digital questionnaire with the option to also add a sustainability report (*Recommended*)
- Only upload a sustainability report

R2. What is the time period covered by your Communication on Progress? (MM/YYYY - MM/YYYY)

Please share the date range of the reporting period used for the Communication on Progress option you select.

01/2022 - 12/2022

Governance

[Click for additional guidance](#)

G1. Does the board/highest governance body or most senior executive of the company:

(Select all that apply)

- Issue an annual statement about the relevance of sustainable development to the company
- Issue an annual statement that addresses impacts on both people and the environment
- Issue an annual statement highlighting a zero tolerance for corruption
- Sign off on organizational sustainability targets
- Supervise Environmental, Social, and Governance reporting
- Regularly review potential risks related to the business model
- None of the above

G1A. (Optional) Please provide additional information:

For more than 30 years now, loyalty and transparency in our work have always been our objective. We at Overgas strongly believe in the rights of the public interest. Therefore we are fully consumer-oriented and our main responsibility is to provide full access to the one of the most environment-friendly energy, i.e. natural gas, here in Bulgaria. We adhere to the principles of good commercial practices and accept every market rules as an incentive for development and constant improvement. As one of the leading companies working on energy market in Bulgaria, our company has its own Corporate Governance Code valid for all of the units of the holding. We also do have very strict internal labor regulations and our Letter of Intent / Declaration of Membership to UNGC give us the confidence to label our work as transparent, social oriented and focused on our footprint to society and nature locally and globally, regarded with the UN 10 principles.

G2. Does the company have a publicly stated commitment regarding the following sustainability topics?

(Select one answer per line)

	No, this is not a current priority	No, but we plan to have a commitment within 2 years	Yes, and the commitment is focused on our own operations	Yes, and the commitment includes our own operations and suppliers	Yes, and the commitment includes our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	Yes, and the commitment includes our own operations and the value chain (e.g.,
Environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	Yes, and the

G2A. (Optional) Please provide additional information:

Overgas has a public environmental policy and Corporate Governance Code, with rules on anti-corruption. Our teams use internal instructions refereed to anti-corruption and how to avoid corruption on a daily bases. As part of the UNGC in Bulgaria and one of its very first members, our statements are public and we advocate to commitment and real actions related with the sustainability topics.

G2A. (Optional) Please upload supporting documentation if applicable:

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

G3. Does the company have a code of conduct in place regarding each of the following sustainability topics?

(Select one answer per line)

	No, this is not a current priority	No, but we plan to within the next two years	Yes, focused on employee conduct	Yes, focused on employees and suppliers	Yes, focused on our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>



G3A. (Optional) Please provide additional information:

G4. Has the company appointed an individual or group responsible for each of the following sustainability topics?

(Select one answer per line)

	No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decision-making authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence of some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights)	Yes, with direct influence at the highest levels of the organization (e.g., has access to relevant information, includes most senior members of organization)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

G4A. (Optional) Please provide additional information:

G5. Does the company have a formal structure(s) (such as a cross-functional committee) to address each of the following sustainability topics?

(Select one answer per line)

	No formal structure No formal structure	Yes, and with limited influence on outcomes (e.g., limited access to internal information necessary to understand risks, poor representation from relevant departments or functions)	moderate influence on outcomes (e.g., it includes representatives of some functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, reports to senior manager)	Yes, with direct influence on outcomes (e.g., it includes representatives of functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, it involves one or more members of senior management)	Yes, and with direct influence at the highest level of the organization (e.g., full access to relevant information, it involves members at highest level of organization)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

G5A. (Optional) Please provide additional information:

G6. Does the company have a process or processes to assess risk?

(Select one answer per line)

	No, this is not a current priority	No, but we are planning to develop on within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers	Yes, related to our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human rights risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Corruption risks

Yes, related to our own operations and the value

G6A. (Optional) Please provide additional information:

G7. Does the company have a due diligence process through which it identifies, prevents, mitigates, and accounts for actual and potential negative impacts on sustainability topics?

(Select one answer per line)

	No, this is not a current priority	No, but we are planning to develop one within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers	Yes, related to our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human rights risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour rights risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental risks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Corruption risks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

G7A. (Optional) Please provide additional information:

We do have risk assessment analysis report, but this report is more operational and related with other key business topics.

G8. Are there any processes through which members of the company's workforce can raise concerns about the company's conduct related to human rights, labour rights, environment, or anti-corruption?

(Select one option)

No, this is not a current priority

No, but we are planning to develop one within the next two years

No, but we plan to within two years

Yes, we have an informal process (e.g., through supervisors, others)

Yes, we have a formal process

G8A. (Optional) Please provide additional information:

Overgas has formal internal committees which work on topics, important for the employees, like human and labor rights.

G8.1. Please provide additional detail regarding the process(es) the company has through which members of the company's workforce can raise concerns about the company's conduct.

(Select one answer per line)

No

Yes

Is the process communicated to all employees/workers in local languages?

Is the process available to non-employees (e.g., suppliers, consumers, communities, and other business relationships)?

Is the process confidential (e.g., whistleblowing process)?

Are there processes in place to avoid retaliation?

Can concerns be raised about suppliers or other business relationships (e.g., clients, partners, etc.)?

Other (Please provide additional information)

No

Yes

G8.1A. (Optional) Please provide additional information:

G9. How does the company capture lessons regarding each of the following sustainability topics?

Please select highest level of engagement.

(Select one answer per line)

	No lessons are regularly captured	Conducts root cause analyses/investigation of incidents	Conducts root cause analyses/investigation and changes organizational policies, processes, and practices accordingly
Human Rights	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
			Systematically conducts root cause analyses/investigation and leverages learnings to influence both internal and external affairs
Human Rights			<input type="radio"/>
Labour Rights/Decent Work			<input type="radio"/>
Environment			<input type="radio"/>
Anti-Corruption			<input type="radio"/>

G9A. (Optional) Please provide additional information:

G10. Is executive pay linked to performance on one or more of the following sustainability topics?

(Select one answer per line)

	No, and we have no intention to change for this is not a current priority	No, but we plan to within two years	Yes
Human Rights	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-Corruption	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

G10A. (Optional) Please provide additional information:

G11. Percentage of individuals within the company's board/highest governance body by:

(Values can be input on the next page)

	Known	Not Applicable
Total number of board members (#)	<input checked="" type="radio"/>	<input type="radio"/>
Male (%)	<input checked="" type="radio"/>	<input type="radio"/>
Female (%)	<input type="radio"/>	<input checked="" type="radio"/>
Non-binary (%)	<input type="radio"/>	<input checked="" type="radio"/>
Under 30 years old (%)	<input type="radio"/>	<input checked="" type="radio"/>
30-50 years old (%)	<input checked="" type="radio"/>	<input type="radio"/>
Above 50 years old (%)	<input checked="" type="radio"/>	<input type="radio"/>
From minority or vulnerable groups (%)	<input type="radio"/>	<input checked="" type="radio"/>
Executive (%)	<input checked="" type="radio"/>	<input type="radio"/>

Executive (%)



Known



Not Applicable

G11. Percentage of individuals within the company's board/highest governance body by:

	Number (Please input answer as a whole number (e.g., 95% = 95))
Total number of board members (#)	3
Male (%)	100
30-50 years old (%)	67
Above 50 years old (%)	33
Executive (%)	100
Independent (%)	33

G11A. (Optional) Please provide additional information:

G12. Do you produce sustainability reporting according to:

(Select all that apply)

- National/local regulation on sustainability
- Security exchange regulations
- Non-Financial Reporting Directive of the European Union (NFRD)/Corporate Sustainability Reporting Directive (CSRD)
- Global Reporting Initiative (GRI)
- Sustainability Accounting Standards Board (SASB, now consolidated into the IFRS Foundation)
- International Integrated Reporting Council (IIRC, now consolidated into the IFRS Foundation)
- Climate Disclosure Standards Board (CDSB, now consolidated into the IFRS Foundation)
- Task Force on Climate-related Financial Disclosures (TCFD)
- Other voluntary frameworks (Please specify in text)

box)

No sustainability reporting according to any frameworks nor regulations outside of this Communication on Progress

G12A. (Optional) Please provide additional information:

G13. Is the information disclosed in this questionnaire assured by a third-party?

(Select all that apply)

Limited assurance for minority of metrics (e.g., GHG emissions only)

Limited assurance for majority of metrics

Reasonable assurance for minority of metrics

Reasonable assurance for majority of metrics

Other (Please provide additional information)

No assurance for any metrics

G13A. (Optional) Please provide additional information:

Overgas is using "white certificates" as a tradable asset which proves that a certain percentage of energy savings has been achieved relative to a baseline. Also we do have annual financial and non-financial reporting (regulated by law) and an annual report, created by an independent auditor. We have an audit committee consisting of 1 external and 2 internal experts, which reports directly to the General Meeting of Shareholders of Overgas.

Human Rights

[Click for additional guidance](#)

HR1. Which of the following has the company identified as material human

rights topics connected with its operations and/or value chain, whether based on their salience (e.g., the most severe potential negative impacts on people) or another basis?

(Select all that apply)

Note: Labour rights topics (Freedom of association and the effective recognition of the right to collective bargaining, child labour, forced labour, non-discrimination in respect of employment and occupation, and a safe and healthy working environment) are a subset of human rights and for completeness, were included in this question. Regardless of these labour topics being selected as material in this question or not, all companies will be asked to provide additional details about these labour rights topics in the next section (L.1 and following). For the other human rights topics selected as material in this question, seven additional questions will be asked in the following section

- Freedom of association and the effective recognition of the right to collective bargaining
- Child labour
- Forced labour
- Non-discrimination in respect of employment and occupation
- Safe and healthy working environment**
- Working conditions (wages, working hours)**
- Freedom of expression
- Access to water and sanitation
- Digital security / privacy**
- Gender equality and women's rights
- Rights of indigenous peoples
- Rights of refugees and migrants
- Other

- No human rights topics have been identified as material

HR1A. Which topics has the company identified as material human rights topics connected with its operations and/or value chain, whether based on their salience (e.g., the most severe potential negative impacts on people) or another basis?

(Optional) Please provide additional information:

HR2. Does the company have a policy commitment in relation to the following human rights topics?

(Select one answer per line, values can be input on the next page)

No, and we have no plans to develop a policy

No, but we plan to within the next two years

Yes, included within a broader policy or as a stand-alone policy

Digital security / privacy

HR2A. (Optional) Please provide additional information:

HR2A. (Optional) Please upload supporting documentation if applicable:

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

HR2. Please input the year the relevant human rights policy was last reviewed:

Year policy last reviewed (YYYY)

Digital security / privacy

2018

HR2.1. For each human rights policy commitment, is it:

(Select all that apply)

Aligned with international human rights

Publicly

Approved at most senior level of the

Applied to the company's own

Applied to the company's own operations

	standards	available	company	operations	and suppliers Applied to
Digital security / privacy	<input type="checkbox"/> Aligned with international human rights standards	<input type="checkbox"/> Publicly available Applied to the company's own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)	<input checked="" type="checkbox"/> Approved at most senior level of the company	<input type="checkbox"/> Applied to the company's own operations	<input type="checkbox"/> the company's own operations and suppliers
Digital security / privacy		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/> Other (Please provide additional information)

HR2.1A. (Optional) Please provide additional information:

HR3. In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following human rights topics?

Please select the company's highest level of engagement.

(Select one answer per line)

	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent or mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question
Digital security / privacy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digital security / privacy		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

HR3A. (Optional) Please provide additional information:

HR4. What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with this human rights topic?

(Select all that apply)

	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g. partners, suppliers, clients, etc.)	Conducted an audit process and/or corrective action plan	Collective Action with peers or other stakeholders to address the issue
Digital security / privacy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)	No action within reporting period
Digital security / privacy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

HR4A. (Optional) Please provide additional information:

HR5. Who receives training for the following human rights topics?

(Select all that apply)

	No training provided	Select employees	All employees	Contractors	Direct suppliers of the organization
Digital security / privacy	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Indirect suppliers of the organization	Other - such as partners, clients, etc.
Digital security / privacy	<input type="checkbox"/>	<input type="checkbox"/>

HR5A. (Optional) Please provide additional information:

HR6. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following human rights topics?

Please select the company's highest level of engagement.

(Select one answer per line)

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Digital security / privacy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

HR6A. (Optional) Please provide additional information:

HR7. During the reporting period, has the company been involved in providing or enabling remedy if it has caused or contributed to adverse impact associated with the following human rights topic(s)?

(Select one answer per line)

	No remedy provided/enabled	Yes, remedy provided/enabled	No adverse impact identified or caused	Choose to not disclose
Digital security / privacy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

HR7A. (Optional) Please provide additional information:

HR8. Briefly describe additional relevant practical actions the company has

HR8. Briefly describe additional relevant practical actions the company has taken during the reporting period and/or plans to take to implement the human rights principles, including any challenges faced and actions taken towards prevention and/or remediation.

In relation to COVID 19 crisis, the need to protect employees' health and in line with Government policies and recommendations Overgas reorganized its activities as to ensure safe environment, work from home when possible, constant health support to employees in need and other preventive measures. Afterwards the flexible mode was continued where possible and formalized with additional agreements. Overgas ensures and encourages equal opportunities for career or professional development regardless of gender, age, race and or other characteristics. Overgas has developed and implements a family friendly policy (for more information, please visit "Labor").

Labour

[Click for additional guidance](#)

L1. Does the company have a policy commitment in relation to the following labour rights principles?

(Select one answer per line)

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Forced labour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Child labour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Working conditions
(wages, working
hours)

No, and we have
no plans to
develop a policy

No, but we plan to
within the next two
years

Yes, included
within a broader
policy as a
stand-alone policy

Not applicable
(Please provide
additional
information)

L1A. Not applicable (Please provide additional information):

Child and forced labor is regulated by the national law.

L1A. (Optional) Please provide additional information:

Overgas follows the National legislation regarding healthy and safe working conditions and environment for the employees. We also do have internal labor rules, internal rules for determining wages in the company and we regularly update and share clear information about the working conditions related to our employees. The main obligations of each employer in Bulgaria are regulated in the Labor Code and the Act on Health and Safety at Work.

L1. Please input the year the relevant labour rights policy was last reviewed:

Year policy last reviewed (YYYY)

Safe and healthy
working environment

2022

Working conditions
(wages, working
hours)

2016

L1A. (Optional) Please provide additional information:

L1.1. For each labour rights policy commitment, is it:

(Select all that apply)

Aligned with
international
labour

Publicly

Approved
at most
senior level
of the

Applied to
the
company's
own

Applied to the
company's own
operations and
the value chain
(e.g., suppliers,
consumers,
communities,
other business

	labour standards	Publicly available	of the company	own operations	other business relationships
Safe and healthy working environment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Working conditions (wages, working hours)	Aligned with international labour standards <input type="checkbox"/>	Publicly available <input type="checkbox"/>	Approved at most senior level of the company <input checked="" type="checkbox"/>	Applied to the company's own operations <input checked="" type="checkbox"/>	company's own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships) <input type="checkbox"/>

	Developed in consultation with workers and their representatives	Developed involving labour expertise from inside and outside the company	Other (Please provide additional information)
Safe and healthy working environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Working conditions (wages, working hours)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

L1.1A. (Optional) Please provide additional information:

L1.2. Does the existing company's policy on freedom of association and collective bargaining:

(Select all that apply)

- Reference the respect for the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal and protect workers against acts of antiunion discrimination
- Prohibit any acts of interference in trade unions
- Facilitate collective bargaining with the trade union representatives
- Provide trade union representatives with the information required for meaningful bargaining in the context of bona fide negotiations
- Reference the respect for the right of workers to submit grievances without suffering
- We do have a policy on freedom of association or collective bargaining but it does not include any of these details
- We do not have a policy on freedom of association or collective bargaining**

L1.2A. (Optional) Please provide additional information:

L1.2A. (Optional) Please upload supporting documentation if applicable:

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

L2. In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following labour rights topics?

Please select the company's highest level of engagement.

(Select one answer per line)

	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent or mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question
Freedom of association and the effective recognition of the right to collective bargaining	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forced labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(wages, working hours)

	No engagement on this topic To assess progress in preventing/mitigating the risks/impacts in question	To better understand the risks/impacts in question To collaborate in the prevention/mitigation of the risks/impacts in question	To discuss potential ways to prevent or mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question Other (Please provide additional information)
Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
Forced labour	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
Child labour	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>		<input type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>		<input type="radio"/>	<input checked="" type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>		<input type="radio"/>	<input checked="" type="radio"/>

L2A. Other (Please provide additional information):

Our work is checked and verified by the national authorities like National Revenue Agency (NRA), National Social Security Institute (NSSI) and Executive Agency General Labour Inspectorate.

L2A. (Optional) Please provide additional information:

L3. What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with this labour rights topic?

(Select all that apply)

- Built capacity among relevant business
- Conducted an audit
- Collective Action with peers or other stakeholders, in particular

	Provided internal training/capacity building for the direct workforce	relationships (e.g., suppliers, consumers, communities) among relevant business relationships (e.g., suppliers, consumers, communities)	process and/or corrective action plan	workers' organizations, or other stakeholders, in particular workers' organizations, to address the issue
Freedom of association and the effective recognition of the right to collective bargaining	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forced labour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Child labour	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-discrimination in respect of employment and occupation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Safe and healthy working environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Working conditions (wages, working hours)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)	No action within reporting period
Freedom of association and the effective recognition of the right to collective bargaining	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Forced labour	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Child labour	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Non-discrimination in respect of employment and occupation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Safe and healthy working environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Working conditions (wages, working hours)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

L3A. (Optional) Please provide additional information:

L4. Who receives training for the following labour rights topics?

(Select all that apply)

	No training provided	Select employees	All employees	Contractors	Direct suppliers of the organization
Freedom of association and the effective recognition of the right to collective bargaining	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forced labour	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Child labour	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-discrimination in respect of employment and occupation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Safe and healthy working environment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Working conditions (wages, working hours)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Indirect suppliers of the organization	Other – such as partners, clients, etc.
Freedom of association and the effective recognition of the right to collective bargaining	<input type="checkbox"/>	<input type="checkbox"/>
Forced labour	<input type="checkbox"/>	<input type="checkbox"/>
Child labour	<input type="checkbox"/>	<input type="checkbox"/>
Non-discrimination in respect of employment and occupation	<input type="checkbox"/>	<input type="checkbox"/>
Safe and healthy working environment	<input type="checkbox"/>	<input type="checkbox"/>
Working conditions (wages, working hours)	<input type="checkbox"/>	<input type="checkbox"/>

L4A. (Optional) Please provide additional information:

L5. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following labour rights topics?

Please select the company's highest level of engagement.

(Select one answer per line)

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)
Freedom of association and the effective recognition of the right to collective bargaining	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forced labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (Please provide additional information)

Freedom of association and the effective recognition of the right to collective bargaining	<input type="radio"/>
Forced labour	<input type="radio"/>
Child labour	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>

L5A. (Optional) Please provide additional information:

L6. Do(es) the existing collective bargaining agreement(s) provide(s) more favourable rights than those provided in legislation, where appropriate?

(Select all that apply)

- Yes, by providing more favourable conditions related to wages
- Yes, by providing more favourable conditions related to working hours
- Yes, by providing more favourable conditions related to health coverage and/or sick leave
- Yes, by providing additional rights not otherwise provided (Please provide additional information)
- There is (are) no existing collective bargaining agreement(s)**
- No

L6A. (Optional) Please provide additional information:

L7. In the course of the reporting period, what was the percentage of women in managerial positions?

- Percent women - (Please input answer as a whole number (e.g., 95% = 95))**
- Unknown

L7A. (Optional) Please provide additional information:

L8. What was the average ratio of the basic salary and remuneration of women to men (comparing jobs of equal value) during the reporting period?

Salary ratio (Women/Men %)
- (Please input answer as a whole number (e.g., 95% = 95))

Unknown

Choose to not disclose

L8A. (Optional) Please provide additional information:

L9. In the course of the reporting period, how frequently were workers injured (injuries per hour worked)?

Frequency of injury -
(Please input answer as a whole number (e.g., 95% = 95))

Unknown

Choose to not disclose

L9A. (Optional) Please provide additional information:

L10. In the course of the reporting period, what was the company's incident rate (injuries per worker)?

Incident Rate - (Please input answer as a whole number (e.g., 95% = 95))

Unknown

Choose to not disclose

L10A. (Optional) Please provide additional information:

L11. In the course of the reporting period, has the company been involved in providing or enabling remedy if it has caused or contributed to the adverse impact associated with the following labour rights topics?

(Select one answer per line)

	No remedy provided/enabled	Yes, remedy provided/enabled	No adverse impact identified or caused	Choose to not disclose
Freedom of association and the effective recognition of the right to collective bargaining	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forced labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Working conditions (wages, working hours)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

L11A. (Optional) Please provide additional information:

L12. Briefly describe additional relevant practical actions the company has taken during the reporting period and/or plans to take to implement the labour rights principles, including any challenges faced and actions taken towards prevention and/or remediation.

Overgas creates and follows a sustainable policy of social responsibility towards its employees. The company aims to increase the productivity of each person, part of every team. We are developing ways to increase the employees' work potential, competitiveness and activity through regular trainings and access to portfolio of different volunteering activities and ways to support Bulgarian society. Our social program gives access to free life insurance and additional health insurance, financial support for raising a child up to 2 years old and financial support for all of our parents, raising their children alone. In order to develop and increase the motivation among our employees and to give them the opportunity to choose their ways of effective working - we use flexible working hours, hybrid working opportunities and additional days off for Bulgarian national holidays. In 2022, we have provided an employment opportunity for Ukrainian refugees and we've opened our admission process widely.

Environment

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E1. Does the company have a policy commitment on the following environmental topics?

(Select one answer per line)

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)
Climate change	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Forests/Biodiversity/Land use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

EIA. Not applicable (Please provide additional information):

As one of the UNGC members, our company has its commitment to be active citizen of the Bulgarian society, to work and create ways for more effective cooperation between different stakeholders. We follow and aligning our operations to the Ten Principles on human rights, labour, environment and anti-corruption but we are still developing our ways and actions related with climate change, water, oceans, etc.

EIA. (Optional) Please provide additional information:

We prepare an annual ecological assessment of the reduced harmful emissions – acid oxides, PM, greenhouse gas (GHG) as a result of replacing solid and liquid fuels with natural gas for our licensed territories – 32 municipalities in Bulgaria.

EI. Please input the year the relevant environment policy was last reviewed:

Year policy was last updated (YYYY)

Climate change	2022
Forests/Biodiversity/Land use	2022
Air pollution	2022

EI.1 For each environmental policy commitment, is it:

(Select all that apply)

	Aligned with international environmental standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Climate change	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forests/Biodiversity/Land use	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Air pollution	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Developed involving environmental expertise from inside and outside the company	Other (Please provide additional information)
Climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Forests/Biodiversity/Land use	<input type="checkbox"/>	<input type="checkbox"/>
Air pollution	<input checked="" type="checkbox"/>	<input type="checkbox"/>

E1.1A. (Optional) Please provide additional information:

In the prepared reporting information for energy savings, needed for the Sustainable Energy Development Agency (SEDA), we've calculated and sent information about the reduced amounts of greenhouse gases from each new gasified household or business user during the reporting year. We prepare and publish on the company's website an annual ecological effect of the replacement of the used energy sources before gasification (Scope 3)

E1.1A. (Optional) Please upload supporting documentation if applicable:

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

E2. In the course of the reporting period, has the company engaged with affected stakeholders or their legitimate representatives in relation to the following environmental topics?

Please select the company's highest level of engagement.

(Select one answer per line)

	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent/mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question
Climate change	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent/mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question
Water	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/biodiversity/land use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question	Other (Please provide additional information)
Climate change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/biodiversity/land use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

E2A. (Optional) Please provide additional information:

We are sending information to all the cities that signed the "Covenant of Mayors", part of the EU initiative Covenant of Mayors for Climate & Energy (<https://eu-mayors.ec.europa.eu/en/home>) for the reduction of GHG. We participated in the discussion of municipal programs for improving the quality of atmospheric air locally.

E3. What type of action has the company taken in the reporting period with the aim of preventing/mitigating the risks/impacts associated with these

environmental topics?

(Select all that apply)

	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g. suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective Action with peers or other stakeholders to address the issue
Climate change	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Oceans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forests/Biodiversity/Land use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Air pollution	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Energy & resource use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)	No action within reporting period
Climate change	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Water	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Oceans	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Forests/Biodiversity/Land use	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Air pollution	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Energy & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

E3A. (Optional) Please provide additional information:

Every year since 2001, Overgas reforests about 0.06 – 0.10 hectares of trees, together with the State forestry and secondary school students. For the past more than 20 years we have reforested over 50.3 hectares of forest throughout the country. As stated above – we have prepared, analyzed and sent 32 environmental impact reports to municipalities with whom we work as our licensed territories in Bulgaria, with the exact numbers of reduced harmful emissions and GHG thanks to using natural gas.

E4. How does the company assess progress in preventing/mitigating the risks/impacts associated with the following environmental topics?

Please select the company's highest level of engagement.

(Select one answer per line)

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/goals, track progress over time (internal programmes only)	Set annual targets/goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Climate change	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forests/Biodiversity/Land use	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

E4A. (Optional) Please provide additional information:

E5. In the course of the reporting period, has the company been involved in providing or enabling remedy for any impacts associated with the following environmental topics?

following environmental topic(s)?

(Select one answer per line)

	Yes, remedy provided/enabled	No remedy provided/enabled	No adverse impact identified or caused	Choose to not disclose
Climate change	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Oceans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Forests/Biodiversity/Land use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Air pollution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Energy & resource use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

E5A. (Optional) Please provide additional information:

E6. Do you know the company's gross Scope 1 and Scope 2 greenhouse gas emissions for the reporting period?

(Values can be input on the next page)

	Known	We did not measure our gross emissions [Please explain in the text box]
Scope 1 emissions	<input checked="" type="radio"/>	<input type="radio"/>
Scope 2 emissions	<input checked="" type="radio"/>	<input type="radio"/>

E6. What were the company's gross Scope 1 and Scope 2 greenhouse gas emissions for the reporting period?

Measured Total Emissions (tCO₂e)

Scope 1 emissions

Scope 2 emissions

Measured Total Emissions (tCO₂e)

187

E6A. (Optional) Please provide additional information:

E7. What were the company's gross Scope 3 global greenhouse gas (GHG) emissions for the reporting period?

- We fully measured Scope 3 GHG emissions [Please input the measured tCO₂e in the text box below]
- We partially measured Scope 3 GHG emissions [Please input the measured tCO₂e in the text box below]**
- We did not measure Scope 3 GHG emissions

E7A. Please provide additional information, including measured tCO₂e:

The reduced GHG emissions from Overgas's new customers in 2022 are 394,000 tco2 eqv.

E7.1. Which Scope 3 categories are included in the organization's Scope 3 emissions calculation?

(Select all that apply)

- Purchased goods and services
- Capital goods
- Fuel- and energy-related activities**
- Upstream transportation and distribution
- Waste generated in operations
- Business travel
- Employee commuting
- Upstream leased assets
- Downstream transportation and distribution
- Processing of sold

- Processing of sold products
- Use of sold products
- End-of-life treatment of sold products
- Downstream leased assets
- Franchises
- Investments
- Other - upstream
- Other - downstream
- Unknown

E7.1A. (Optional) Please provide additional information:

E8. What percentage of the company's revenue was invested in R&D of low-carbon products/services during this reporting period?

- Percent of revenue (%) - (Please input answer as a whole number (e.g., 95% = 95))
- Unknown
- Not applicable (Please provide additional information)**

E8A. Not applicable (Please provide additional information):

Overgas is doing a research through its subsidiary and the investment in this research is outside of the scope of this report.

E8A. (Optional) Please provide additional information:

E9. Has the organization acted to support climate change adaptation and

resilience?

(Select all that apply)

- We have taken action to increase organization-wide resilience to climate change
- We have taken action to increase resilience in our supply chains
- We have taken action to increase resilience in the communities in which we operate**
- We have provided funding for climate change adaptation and resilience initiatives and projects
- We have not taken actions to build climate change resilience in the reporting period
- Unknown

E9A. (Optional) Please provide additional information:

We have taken actions to replace solid and liquid fuels with natural gas in Bulgaria, which leads to a reduction of over 300 thousand tCO2 eqv/year.

E10. Please report the company's renewable energy consumption as a percentage of total energy consumption in the reporting period.

- % of total energy consumption - (Please input answer as a whole number (e.g., 95% = 95))
- Unknown**

E10A. (Optional) Please provide additional information:

E11. What percent of the company's revenue came from low-carbon products/services during this reporting period? If applicable, please give a description of the products/services included in your calculation (e.g., relevant certifications)

- Percent of total revenue (%) - (Please input answer as a whole number (e.g., 95% = 95))
- Not applicable (Please provide additional

E11A. (Optional) Please provide additional information:

E12. Which of the following has the company identified as material environmental topics connected with its operations and/or value chain (e.g., based on the most severe actual or potential negative impacts on people and/or the environment)?

(Select all that apply)

- Water
- Forests/Biodiversity/Land use
- Air pollution
- Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)
- None of the topics have been identified as material by the company**

E12A. (Optional) Please provide additional information:

E22. Briefly describe additional relevant practical actions the company has taken during the reporting period and/or plans to take to implement the environment principles, including any challenges faced and actions taken towards prevention and/or remediation.

Overgas undertakes preventive actions to secure the positive environmental impact of all its investment projects, as well as assesses the compatibility of plans, programs, projects, targets and investment proposals with the site and the objectives of compliance with the protected areas. In the reporting 2022 year, 5 impact assessments were prepared, 32 reports on the environmental effect of the replacement of solid fuels in the municipalities on the territory of our licenses were made. Our principle for environmental protection and and reducing air pollution by creating ways for more responsible use of Earth's resources, is critical for our understanding as one of the key utility business in Bulgaria.

[Click for additional guidance](#)

AC1. Does the company have an anti-corruption compliance programme?

- No, it is not an immediate business priority
- No, but we plan to within the next two years
- Yes

AC1A. (Optional) Please provide additional information:

In accordance with the UN Convention against Corruption, to which the Republic of Bulgaria has been a party since 2006, Overgas opposes all forms of corrupt practices both in the company and in society. Intolerance and countering corrupt practices is one of the main responsibilities for each employee in the company's system. Overgas has written instructions, rules, guidelines and use preventive control against the risk of malpractices and corruption. The company has its own zero-tolerance policy for corruption, bribery and extortion. The policy contains the following documents: • Corporate Governance Code of the Overgas Group; • Internal Instruction named ""Overgas INK 10.01.05"" for conducting an auction for the selection of a supplier of goods or services, part of the internal Overgas system; Instruction INK 10.01.05 for conducting an auction for the selection of a supplier of goods or services in the Overgas system is focused on processes related to potential business partners, suppliers of goods and services. It aims to secure publicity, transparency and efficiency in spending the funds provided for supplies, services and construction work by Overgas. The instruction regulates the selection, objective and impartial evaluation of each candidate when awarding orders for the supply of goods or services, while at the same time minimizing the risk of choosing the incorrect supplier. The instruction is applied by all officials in Overgas participating in the tender for the selection of a contractor of construction and mounting works or a supplier of goods/services, in cases where the Law on Public Procurement (LPP) does not apply. Public procurement is conducted by requiring applicants to declare compliance with labor, environmental and anti-corruption principles, which is in accordance with legal requirements, internal company rules and commitments to the UN Global Compact. Failure to comply with current regulations and any form of corruption and bribery is punishable and has zero tolerance on the part of the company. • Rules for the internal labor; • Risk management procedure; • Procedure for consideration and resolution of applications, complaints and proposals, regulating the procedure for accepting and processing applications, complaints, signals and proposals from individuals and legal entities; • Procedure for counteracting bad practices; • Implemented contract management module - part of the implemented electronic information system for public procurement (ISOP) for external suppliers. Since September 2020, as a sectoral contracting authority, Overgas has been using the Centralized Automated Information System ""Electronic Public Procurement"" (CAIS EOP). The aim of the system is to make it impossible to carry out corrupt practices, bribery or extortion. Except from the above, another tool which the company utilizes for avoiding corruption practises is the choice of suppliers of goods and services and assignees for construction through the online platform ""Auxionize"".

Periodically, trainings, seminars and briefings are held for employees to secure their knowledge for situations in which they may encounter various forms of corruption and in particular - abuses, extortion or offering bribes.

AC1.1. If yes, in what year was this programme last reviewed? (YYYY)

2022

AC1.1A. (Optional) Please provide additional information:

AC2. Does your company have policies and recommendations for employees on how to act in case of doubt and/or in situations that may represent a conflict of interest, e.g., with regard to gifts and hospitality, donations, sponsorship, or interactions with public officials?

- No, and we have no plans to develop them
- No, but we plan to within the next two years
- Yes, included within a broader policy or as a standalone policy**

AC2A. (Optional) Please provide a link, and/or provide additional information:

The internal labor regulations oblige employees NOT to receive gifts, presents or any material benefits from third-party individuals or legal entities in connection with the performance of their work duties. Investigations, legal cases, decisions and other relevant events related to corruption and bribery, are carried out in accordance with the requirements of the current legislation and internal company regulations. According to the external risk assessment, the risk of corruption in the field and place of operation of the company is assessed as low.

AC2A. (Optional) Please upload supporting documentation if applicable:

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

AC3. Who receives training on anti-corruption and integrity?

(Select all that apply)

- Select employees
- All employees**
- Contractors
- Direct suppliers of the organization
- Indirect suppliers of the organization
- Other – such as partners, clients, etc.
- No training provided

AC3A. (Optional) Please provide additional information:

AC3.1. How often is such training provided?

(Select one answer per line)

- | | One time only | Every two or more years | Every year | We do not collect this data |
|---------------|-----------------------|-------------------------|----------------------------------|-----------------------------|
| All employees | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

AC3.1A. (Optional) Please provide additional information:

In implementation of the anti-corruption policies and for the reduction of corruption risks and incidents, Overgas carries out the following specific actions in the individual directions: • Provision of mechanisms for suggestions, signals and complaints through: - dispatch center (24/7) with emergency phone; - unified information center - for signals and calls; - customer centers of Overgas group companies; - reports to the "Tender Commission" in the company; - procedure for consideration and resolution of applications, complaints and proposals from individuals and legal entities. • Raising awareness and providing training to employees about the company's zero-tolerance policies regarding corruption and bad practices: - internal information system for company policy; - conducting employee trainings during the annual audits in the companies of the OVERGAS system; - training of newly hired employees. • Responsibilities for anti-corruption in the company are distributed between: - the executive directors from the Overgas group; - the

AC4. Does the company monitor its anti-corruption compliance programme?

(Select all that apply)

- Review topics on ad hoc basis
- Yes, through internal employee self-evaluations
- Yes, through automated controls monitoring**
- Yes, through external independent monitoring
- Yes, through other mechanisms (Please provide additional information)
- No, we do not monitor the anti-corruption compliance programme (Please provide additional information)

AC4A. (Optional) Please provide additional information:

The company has countermeasure procedures that include the detection, prevention or suppression of activity that is inconsistent with regulatory requirements or directed against the interests of the company. Overgas use implemented system for managing tender procedures which contributes to the prevention of corrupt practices in the selection of suppliers of goods and services. Our company carry out strict accounting and financial reporting, which is subject to annual internal and external independent audit control. Audit cards have been introduced for the results of internal audits of companies from the Overgas system. They have a separate section "Combating bad practices", which includes a system of indicators for measuring the level of risks of corruption actions. In 2022, there were no complaints from customers, partners, employees about possible corruption cases, including no appeals against the decisions of the tender committee for the selection of a supplier from the public pronouncements. The awareness of the company's employees in the field of anti-corruption has been increased.

AC5. Please report the company's total number and nature of incidents of corruption during the reporting year.

(Select one answer per line, values can be input on the next page)

Known

Unknown

Choose not to disclose

Confirmed during the current year, but related to previous years



Confirmed during the current year, and related to this year

Known



Unknown



Choose not to disclose



AC5. Please report the company's total number and nature of incidents of corruption during the reporting year.

Number of Incidents

Confirmed during the current year, but related to previous years

Confirmed during the current year, and related to this year

AC5A. Please describe the nature of the incidents in the text box below:

We don't have any reported incidents of corruption during the reporting year.

AC6. Within the reporting period, what measures has the company taken to address suspected incidents of corruption independently or in response to a dispute or investigation by a government regulator?

(Select all that apply)

- Initial case assessment
- Internal investigation
- Review by risk/ethics committee
- Review by board of directors
- External audit/review
- Other (Please provide additional information)

Not applicable/no incidents in the reporting period

AC6A. (Optional) Please provide additional information:

AC7. Does your company engage in collective action against corruption?

- No, it is not an immediate business priority
- No, but we plan to in the next two years
- Yes (Please explain)

AC7A. Yes (Please explain):

Overgas participates in discussions, conferences and forums on topics related to the promotion of entrepreneurial activity in Bulgaria, legislative initiatives to ease business, and we stand against the "gray" economy. Overgas is also part of the "Bulgarian Natural Gas Association" where the whole sector in the country actively raise awareness to different topics and current issues to the representatives of the state authorities, related to bad practices and legal abuses in the natural gas market. Overgas is an active advocate and defender of the free energy market. We stand for anti-corruption on every government level and we support the very needed free access to international markets at all public events and energy conferences, workshops and communication to state and other related institutions. Also, we do use the following statements in our work:

- Prohibition of activities and provision of consulting services competing with the company's activities by members of the Board of Directors and employees.
- Identifying and resolving situations with conflicts of interest from the company's employees.
- Strict financial and accounting reporting, which is subject to internal and external audit control.

AC7A. (Optional) Please provide additional information:

AC8. Briefly describe additional relevant practical actions the company has taken during the reporting period and/or plans to implement the anti-corruption principle, including any challenges faced and actions taken towards prevention and/or remediation.

For the coming year, the company's anti-corruption goals include:

- implementation of preventive activities to prevent corruption practices;
- timely neutralization and suppression of corrupt practices;
- an active public position by submitting proposals to the state institutions to improve the regulatory framework, including Public Procurement Law.

R4. (Optional) Please upload the sustainability report for your company

(Uploaded file cannot exceed 50MB)

ISO 9001 -EN-titul.pdf

0.4 MB

application/pdf

R4.1. (Optional) Please upload another document if applicable

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

R4.2. (Optional) Please upload another document if applicable

(Uploaded file cannot exceed 50MB)

Drop files or click here to upload

Please click the 'Submit' button below to finalize your submission and publish your report. Our system does not recognize your CoP as finished unless you click 'Submit'.

Thank you for completing the Communication on Progress.

