

BULGARIAN AIR TRAFFIC SERVICES AUTHORITY

**CODE OF ETHICS
OF
BULGARIAN AIR TRAFFIC SERVICES AUTHORITY**

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DOCUMENT INTRODUCTION

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Chapter One GENERAL PROVISIONS

Art. 1. (1) This code sets out the standards and principles governing the ethical conduct expected of persons employed at the Bulgarian Air Traffic Services Authority (BULATSA).

(2) The Code aims to develop an organizational culture based on shared values, which helps to establish the enterprise as a socially responsible structure while applying the universal principles of the UN Global Compact¹, as well as the fundamental principles and rights enshrined in the Universal Declaration of Human Rights, the Charter of Fundamental Rights of the European Union, the conventions of the International Labor Organization, the OECD Guiding Principles and the UN Convention against Corruption.

(3) The provisions of the code are addressed to persons who are employed, regardless of their grounds and capacity, at BULATSA, including, without limitation, all workers and employees at the enterprise, the management of the enterprise, external consultants (natural persons and/or legal entities), suppliers of goods and/or services and other types of partners, trainees/interns, users of the services provided by BULATSA, and other persons related to the enterprise, regardless of the grounds for that.

(4) The code is consistent with the provisions of the Code of Ethical Conduct of Persons Employed at Public Enterprises adopted by the Public Enterprises and Control Agency.

Art. 2. (1) The guiding rules for the ethical conduct of persons employed at BULATSA are as follows:

1. Lawfulness – they must fulfill their official commitments in strict compliance with the national legislation, European and international acts and the internal acts of the enterprise;

2. Independence, integrity, good faith, dignity and impartiality:

a) they must perform their functions entirely independently and prudently, without regard for any personal interests; they must not permit dependence or other ties to outside persons and organizations that could influence the performance of their functions;

b) they must perform the functions assigned to them with dignity;

c) they must strive not to damage in any way the public perception of their independence, integrity and dignity through their actions and statements;

d) they must strive not to damage in any way the public perception of their impartiality through their actions and statements; they must perform their work duties accurately, objectively and without prejudice, avoiding behavior that could be perceived as bias, prejudice or partiality;

3. Loyalty, discretion and confidentiality:

a) they owe loyalty to the enterprise;

b) they must show respect when using the services of other workers and employees at the enterprise;

c) **they** must use the company's material resources responsibly;

d) outside the enterprise, they must refrain from any comments that may damage its reputation;

¹ **Human rights:** Principle 1. Respect and support for the protection of human rights. Principle 2. Guarantee of non-engagement with actions that violate human rights

Labor standards: Principle 3. Acknowledging the freedom of association and effective recognition of the right to collective bargaining. Principle 4. Elimination of all forms of forced and compulsory labor. Principle 5. Effective elimination of child labor. Principle 6. Eradication of discrimination in relation to the right to work and to a profession.

Environment: Principle 7. Support for preventive approaches in environmental protection. Principle 8. Taking on initiatives that encourage greater responsibility towards the environment. Principle 9. Promoting the development and dissemination of environmentally friendly technologies. **ANTI-CORRUPTION:** Principle 10. Support for anti-corruption initiatives and transparency policies.

e) they must maintain confidentiality and exercise discretion when considering and discussing issues related to the activities of the enterprise;

f) in their behavior and statements, they must demonstrate the necessary restraint arising from the functions entrusted to them;

g) they must protect the information acquired in the course of or in connection with the performance of their work duties at the enterprise and must not disclose it outside the procedure established in the legislation and the internal acts;

4. Respect for human rights, ethical values, solidarity and respect for the individual:

a) they must not conduct any actions, the goal of which is physical threat, violence, overstepping their official rights, insult, defamation and other similar actions related to personal rights;

b) they must treat their colleagues, the management of the enterprise, as well as representatives of the enterprise's clients and its partners with respect;

c) they must show respect for individuals, the opinion and private life of colleagues and members of management, and must adhere to a courteous and polite attitude when performing work duties;

d) they must work in a spirit of cooperation, providing other colleagues with skills and knowledge to help achieve the goals of the enterprise;

e) the management of the enterprise must not apply discriminatory rules based on gender, nationality, age, minority status, religion, social means, and the like;

f) the management of the enterprise must encourage the professional and personal development of all its workers/employees, providing them with equal opportunities;

g) the management of the enterprise must support and implement the adopted public standards in order to develop a corporate culture based on the merits and contribution of the workers/employees to the activities of BULATSA;

h) the management of the enterprise must create conditions for the development of an environment of cooperation and teamwork in order to utilize all resources and capacity of BULATSA;

5. Absence of conflict of interest and prevention of corruption:

a) they must not allow any acts of corruption, manifested in influencing the personal will, through unethical and immoral practices, for the purpose of acquiring benefits, accepting (directly or indirectly) gifts or any other type of benefits that would be intended to influence commercial relations, professional relations or administrative decisions;

b) no person employed at the enterprise, regardless of their capacity/position and/or position in the official hierarchy, can commit, encourage or permit corrupt acts or trading in influence;

c) to avoid corrupt acts and/or trading in influence, they are obliged to perform their functions and obligations accurately and in good faith, transparently (without violating the enterprise's trade secrets), not to perform and/or accept actions in violation of the usual work protocol (accepting cash payments, gifts, hospitality, making commitments in deviation from legal provisions, providing undue advantage to a counterparty, including a potential one, when conducting public procurement and/or tenders and competitions in accordance with internal rules, etc.);

d) in case of suspicion or upon detection of any cases of corruption (including bribery), the worker/employee/management of the enterprise must inform the competent authorities;

e) they are guided by the principle of limiting their participation in the activities of commercial enterprises where prerequisites for a conflict of interest exist;

f) they shall disclose and explain the circumstances surrounding any conflict of interest in which they find themselves, including where the same circumstances are a prerequisite for a potential conflict of interest;

g) they must inform the management in cases where they or their close relatives participate or intend to participate in the management bodies of commercial enterprises that would have the same

and competing interests with the enterprise;

h) during the performance of their duties, they must act loyally, preventing the creation of conditions for a conflict between their interests and the interests of BULATSA;

i) they must refrain from expressing opinions on behalf of the enterprise, taking actions or influencing decisions in all cases where these actions are directly or indirectly related to and pursue a personal interest;

j) in cases where doubts arise, workers and employees must inform the management of the enterprise about compliance with business ethics in order to prevent the adoption of decisions that cause suspicions that they are in favor of personal benefits or of acting against the interests of BULATSA;

k) the management of the enterprise implements tools and measures to counter corruption and promote integrity through internal acts;

6. Avoiding unauthorized illegal payments and money laundering:

a) they must apply a policy for prevention of unauthorized payments or money laundering, both when receiving and when paying, in kind or with monetary funds, in cash or by check, or by bank transfer;

b) they must monitor with particular attention any extraordinary payments not foreseen in the agreements or commercial contracts;

c) in cases where doubts exist or the making of an unauthorized payment or money laundering is established, the persons employed at the enterprise must inform the competent authorities;

7. Active channel for reporting violations:

a) the management of the enterprise establishes a dedicated system for reporting violations through internal acts; this system may complement other existing reporting "channels" within the enterprise that the whistleblower may choose;

b) reporting is not an obligation, but an opportunity, and depends on the will and judgment of the worker/employee, and it is the responsibility of management to create such an environment and guarantees of confidentiality and protection for whistleblowers, so that they are motivated to demonstrate intolerance towards the absence of honesty and integrity;

c) any worker and employee, including, without limitation, temporary staff, interns, service providers, can use the whistleblowing system;

d) the whistleblowing system guarantees strict confidentiality of the reported facts, as well as of the personal data of the whistleblower and the person(s) involved or mentioned in the whistleblowing report; the information shall be accessible to a limited number of employees who have been previously designated as responsible for receiving reports and who, in the course of and in connection with this activity, are free from the burden of hierarchical dependencies;

e) the confidentiality requirement will not be considered violated when the management of the enterprise and/or the body exercising the rights of the state find it justified to conduct disciplinary and/or judicial proceedings in connection with the reported facts and the result of their establishing; once disciplinary and/or judicial proceedings have been initiated, the statements of witnesses and/or victims will be used in accordance with the requirements of the applicable legislation.

(2) The management of the enterprise:

1. Must create conditions for and encourage the existence of a corporate culture, including, without limitation, setting a personal example (through words and/or actions) for ethical behavior and involvement in the goals and activities of BULATSA;

2. Must inform and promote among workers and employees the existence and application of criteria and rules for ethical behavior, including dedicating sufficient time to explaining the content and expectations of the provisions of this code;

3. Is obliged to apply approaches that allow for the hiring of the most suitable individuals for each relevant position, in view of their moral and professional qualities, including education and

experience.

Chapter Two

PROFESSIONAL CONDUCT OF THE MANAGEMENT AND OF THE WORKERS AND EMPLOYEES OF BULATSA

Art. 3. (1) Workers and employees are obliged to actively participate in applying the policies of the enterprise, the implementation of the decisions made and the conducting of business, in compliance with the rules under Art. 2.

(2) Workers and employees are obliged to perform their work duties with the necessary professionalism, maintaining up-to-date knowledge and improving their skills in order to perform them effectively.

(3) When making proposals or reporting on their activities, workers and employees are required to provide all the information necessary to make a specific decision.

(4) Workers and employees are obliged to perform their duties honestly, impartially and in good faith, without allowing their personal biases to influence them.

Art. 4. (1) Workers and employees are obliged to comply with the official hierarchy defined in the Regulations on the structure, functions and activities of BULATSA, the internal acts and job descriptions.

(2) Workers and employees can request written confirmation when oral orders addressed to them contain obvious violations of the law.

(3) When a worker or an employee receives an order from his or her immediate superior that contradicts or does not correspond to the order of the higher-ranking manager, the employee is obliged to notify both managers of the contradiction or discrepancy that has arisen and to carry out the order of the higher-ranking manager.

(4) Workers and employees are not obliged to execute an unlawful order issued in accordance with the established procedure when it contains a violation of the law which is obvious to them.

Art. 5. (1) Workers and employees are required to openly and honestly present to their superiors the problems they encounter in the work process.

(2) Workers and employees must notify their direct manager and/or the next manager in the hierarchy about circumstances that have become known to them in the course of or in connection with the performance of their work duties and which are relevant to the achievement of the objectives of the enterprise or the protection of its reputation.

Art. 6. (1) In the performance of their work duties, workers and employees are obliged to use the property entrusted to them for its intended purpose with due care.

(2) Workers and employees are obliged to promptly inform their immediate superior of any damage or loss of the property entrusted to them.

(3) Workers and employees have the right to use documents of BULATSA only for the performance of their work duties in compliance with the rules in the legislation and internal acts for the protection of information and personal data.

Art. 7. Workers and employees are required to observe the established working hours to perform their assigned duties.

Art. 8. (1) The management of the enterprise is obliged to:

1. Issue only lawful orders and commands within the scope of their powers;

2. Manage the activities in the relevant units professionally and competently, setting an example for subordinates with their knowledge, routine and experience;
 3. Specify the tasks clearly, precisely and comprehensively;
 4. Give instructions to workers and employees in the relevant units on the performance of their work duties and supervise the performance of the assigned tasks;
 5. Support workers and employees from the relevant units in resolving social and personal issues;
 6. Show an impartial attitude towards their subordinates;
 7. Objectively evaluate workers and employees.
- (2) The management of the enterprise is obliged to create the necessary organization for the induction of newly hired workers and employees, complying with the requirements in the legislation and internal acts.

Chapter Three

ANTI-CORRUPTION CONDUCT OF THE MANAGEMENT AND OF THE WORKERS AND EMPLOYEES OF BULATSA

Art. 9. (1) The management, workers, and employees are obliged to prevent behavior that involves them in corruption, and to counteract such behavior and other unlawful actions at the enterprise.

(2) The management, workers, and employees must not allow themselves to be placed in economic dependence, as well as to request and/or accept gifts, services, money, benefits or other advantages that may influence the performance of their work duties.

(3) The management, workers, and employees, regardless of their capacity/position/place in the official hierarchy, must not commit, encourage or tolerate corrupt acts or trading in influence.

(4) The management, workers, and employees cannot accept gifts, other benefits or promises of benefits for performing work that falls within their work duties at the enterprise, or for exercising influence on decision-making by other officials in connection with the performance of their work duties and must not perform activities outside their competence.

(5) The management, workers, and employees cannot mediate for the obtaining of a benefit from another person in order to perform or refrain from performing an action related to work duties.

(6) The management, workers, and employees cannot conduct activities in private interest leading to material or immaterial benefits for them or for persons related to them, including with regard to any obligation taken on.

Art. 10. (1) The management, workers, and employees do not have the right to:

1. use their official position to pursue their personal interests or the interests of persons related to them;

2. participate in the discussion, preparation, making and implementation of decisions when they or persons related to them have an interest in the relevant decision.

(2) Workers and employees are obliged to promptly notify their direct superior in any specific case where the performance of an assigned work task may lead to a conflict between their work duties and their private interests.

(3) Workers and employees are obliged to inform their superiors and/or the relevant competent authorities of any information about corruption or conflict of interest at the enterprise which has become known to them.

Chapter Four

RELATIONS WITH COLLEAGUES

Art. 11. (1) The management, workers, and employees are obliged, during and in relation to the performance of their work duties at the enterprise, to show respect and integrity in their relations with colleagues, by not allowing any behavior that violates the dignity and rights of the individual or creates a hostile or offensive environment.

(2) The management, workers, and employees are obliged to respect the opinions of their colleagues and to respect their right to privacy.

(3) No forms of discrimination are allowed in the relations between persons employed at BULATSA.

(4) No behavior classified as harassment of a mental, physical, sexual or any other nature is allowed in the relations between persons employed at BULATSA.

(5) Workers and employees who witness unethical or dangerous behavior, violence, inhumane or offensive treatment of any person by another person employed at the enterprise must report this to their immediate superior or the relevant representative of the enterprise.

Art. 12. The management, workers, and employees must develop their teamwork skills and strive to maintain professional relationships at the workplace.

Art. 13. (1) All disputes between workers and employees must be resolved fairly in open dialog.

(2) When conflicts between workers or employees cannot be resolved by themselves, they are obliged to turn to their direct superiors for assistance.

(3) The management is obliged to take the necessary steps to overcome the conflicts of which it has been notified and/or to eliminate the conditions for their continued existence.

Art. 14. (1) The management must treat workers and employees with respect and respect their personal dignity.

(2) When appointing, transferring or promoting a worker or an employee, the management must observe the principles of good faith and impartiality and not permit any form of discrimination.

Chapter five

PERSONAL CONDUCT

Art. 15. In performing their work duties and in their public life, the management, workers, and employees are obliged to demonstrate conduct that does not undermine the prestige of the enterprise.

Art. 16. (1) The management, workers, and employees are obliged to prevent, both at their workplace and outside it, any behavior that is incompatible with the law and the rules in this code.

(2) The management, workers, and employees at BULATSA are obliged to avoid conflict situations in their behavior, and when these arise – to strive to end them by remaining calm and controlling their behavior.

(3) Employees at BULATSA are obliged to observe decency and a businesslike appearance in their clothing, corresponding to their official position and the status of the enterprise.

Art. 17. The management, workers, and employees must not participate in activities that damage the prestige of the enterprise.

Art. 18. The management, workers, and employees must acquire and manage their property in a manner that does not raise suspicion of abuse of their official position.

Art. 19. In their public life, the management, workers, and employees do not have the right to take advantage of their official position or use their functions for personal gain.

Chapter Six OTHER PROVISIONS

Art. 20. (1) Workers and employees are not entitled to disclose information that has become known to them in the course of and/or in connection with the performance of their work duties, nor are they entitled to make any statements on behalf of BULATSA, except on order or with the consent of the Director General.

(2) Any statements, announcements, opinions, interpretations of positions and facts, interviews and others of a similar nature for the mass media can only be made by the Director General and the employees authorized for this purpose.

(3) Any statement intended for the mass media that is not coordinated according to the established procedure is considered a serious violation of this code.

(4) Workers and employees are not entitled to express opinions and positions outside the procedure provided for in this code in a manner that could be interpreted as the official position of the enterprise.

Art. 21. (1) In case of non-compliance with the requirements of this code and/or in the event that any of the prohibited acts are committed, disciplinary proceedings can be initiated against any person in accordance with the provisions applicable to the enterprise, and if sufficient evidence is available, civil claims and/or criminal proceedings can be initiated upon a report from the company.

(2) The direct superiors must monitor the compliance of the behavior of workers and employees with the rules in this code and, if violations are found, must take the relevant actions in accordance with the applicable legislation and internal acts.

Art. 22. Persons employed at BULATSA cannot be sanctioned for the fact that they have reported a case of violation of the principles of conduct.

Art. 23. (1) The direct superiors of newly hired workers or employees are obliged to ensure that they are familiar with this code within seven days of them being hired.

(2) With regard to all third parties employed at BULATSA on another basis, the relevant authorized representatives of BULATSA, designated as persons responsible for controlling the implementation of the relevant contract/agreement, are obliged to ensure that these persons are familiar with the rules of this code within 7 days of the conclusion of the relevant contract/agreement.

Art. 24. (1) In the implementation of this code, the following will also apply: Good practices for compliance with the basic rules in the Code of Ethics of BULATSA – Appendix No. 1, an integral part of the code, which includes models for good practices in the course of and with regard to the corporate governance of the enterprise.

(2) The good practices in Appendix No. 1 are consistent with the sample Good Practices, which are an integral part of the Code of Ethical Conduct for Persons Employed at Public Enterprises adopted by the Public Enterprises and Control Agency.

ADDITIONAL PROVISIONS

§ 1. Within the meaning of this code:

1. "Inside/enterprise-sensitive information" is precise information, including financial information, that has not been published and that directly or indirectly concerns the company, including, without limitation: strategic projects, commercial negotiations/contracts, litigation, technical information, changes in management and/or the distribution of functions among members of the management bodies, etc.

2. A "conflict of interest" exists where persons employed at BULATSA have a private interest that may affect the impartial and objective performance of their professional powers or duties.

3. "Corruption" is:

a) the act of promising, giving or offering (active corruption) to a third party, but also the act of requesting or receiving (passive corruption) from a third party;

b) securing and seeking an undue advantage, directly or through another person;

c) psychological pressure by making unreasonable demands and threats (act of passive corruption).

4. "Improper advantage" is a reward, regardless of its nature, provided in violation of legal, contractual or professional obligations, including, without limitation, bribery or ransom, gift, fraud, favor, embezzlement of funds and others.

5. "Benefit" is any income in the form of money, cash or property, including the acquisition of shares or stocks, as well as the granting, transfer or waiver of rights, receiving of goods or services free of charge or at prices lower than market prices, receiving a privilege or honor, assistance, a vote in favor of an election, support or influence, an advantage, receiving or promising a job, position, gift, reward or promise to avoid a loss, liability, penalty or other adverse event.

6. A "potential (possible) conflict of interest" exists when circumstances have arisen that may lead to a conflict between the personal interest of the person and the interest of the enterprise in the performance of their duties at BULATSA.

7. "Management of the enterprise/management" are:

a) the persons who conduct operational management – the Director General and the managers directly subordinate to him and directly subordinate to the Deputy Directors General;

b) persons at elective positions held in the governing bodies;

c) the heads of structural units at the enterprise.

8. "Related parties" are:

a) spouses or persons who are in de facto cohabitation, relatives in the direct line, in the collateral line – up to the fourth degree inclusive, and by marriage – up to the second degree inclusive;

b) natural and legal persons with whom the worker or employee has an economic or political dependence that gives rise to reasonable doubts about their impartiality and objectivity.

9. "Trading in influence" is corruption which involves the use of an intermediary between the person benefiting and the person/authority expected to use their influence and/or professional powers to obtain or attempt to obtain the desired decision (rewards, jobs, contracts or any other favorable decision).

10. "Private interest" is any interest that leads to a material or immaterial benefit for a person holding a public office or for persons associated with them, including any obligation assumed.

TRANSITIONAL AND FINAL PROVISIONS

§ 2. The Code of ethics of BULATSA is issued on the grounds of item 16 of section III of the Instructions for the implementation of management responsibility in public sector organizations, approved by the Minister of Finance with order No. ZMF-601/ 09.07.2019, in connection with Art.

13, para. 3, item 8 of the Law on the financial management and control in the public sector and in accordance with the Code of Ethical Conduct for Persons Employed at Public Enterprises adopted by the Public Enterprises and Control Agency and published in January 2024.

§ 3. This code enters into force from the date of its introduction by order of the Director General and repeals the Code of Ethics for Workers and Employees of BULATSA, edition 2.0/12.12.2019, introduced by order No. RD-28-1205/13.12.2019.

§ 4. The Code of Ethics is published on the internal website of BULATSA.

Appendix No. 1

GOOD PRACTICES FOR COMPLIANCE WITH THE BASIC RULES IN THE CODE OF ETHICS OF BULATSA

These Good practices are consistent with the sample Good Practices, which are an integral part of the Code of Ethical Conduct for Persons Employed at Public Enterprises adopted by the Public Enterprises and Control Agency.

Art. 1. (1) Integrity in the policies and conduct of the enterprise is based on strict and conscientious compliance with national and international legislation and other binding documents, which the enterprise implements regardless of the circumstances, and any activity that may engage the enterprise in illegal practices is inadmissible and prohibited.

(2) It is the personal responsibility of every person employed at the enterprise to know the laws, their rights and obligations, as well as to strictly comply with them. Any deviation from this obligation, whether due to the person's personal error and/or due to receiving an order and/or request from a superior, must be reported by the person through the internal channel for reporting of violations.

Art. 2. (1) In the event of a conflict of interest and/or prerequisites for such, the relevant person must immediately notify his/her direct superior, who in turn must comply with the policy adopted by the enterprise for action and risk management in the event of a conflict of interest. Any omission of such a situation constitutes a violation of the ethical norms that are binding for persons employed at public enterprises.

(2) The enterprise must define its own policy, which the management and employees shall comply with in the event of receiving gifts and/or invitations to events, as well as in the event that gifts and/or invitations to events for persons external to the enterprise are undertaken on behalf of the enterprise. A major limitation on the admissibility of receiving and/or giving gifts and/or extending invitations is when the gift/invitation aims to obtain an undue advantage for the active party, including when it creates reasonable suspicion that the recipient is expected to compromise their work duties and responsibilities.

(3) It is inadmissible to disclose inside/enterprise-sensitive information to third parties external to the enterprise, in principle and/or to obtain a personal benefit for the disclosing party or to enable the third party to use the information for their own purposes.

Art. 3. (1) The management, workers, and employees shall not share information with competitors on matters such as prices, costs or strategy, as this may lead to (suspected) market manipulation, distortion of competition and/or the conclusion of prohibited agreements and/or the application of unfair practices.

(2) The body exercising the rights of the state will monitor impartiality in the state policy, which is expected not to allow tax, financial, administrative relief based solely on the fact that the enterprise is state-owned. In the event of a disruption of this balance, it is the responsibility of the body exercising the rights of the state to signal the competent persons about a change in the relevant policy. Failure to comply with this obligation constitutes a violation of the code.

(3) The persons employed at the enterprise are obliged, in accordance with their specifically assigned functions, operational capabilities, and their place in the workplace hierarchy, to conduct discreet and respectful checks of the reputation of any new partners, and to notify their direct superior of the results of such checks. A reliability check of partners is also conducted in established business relationships, in case that data is present in the public domain and/or doubts have arisen among the company's workers and employees.

Art. 4. (1) The enterprise, through its employees, is free to represent and defend its commercial and/or production interests through transparent and open communication with public authorities and/or officials, in writing or orally. The responsible implementation of the pursuit of a specific goal of the state-owned enterprise by persuading public authorities (so-called lobbying) implies transparency when declaring the interest, including identification in good faith of the enterprise and the position and identity of the specific person carrying out the lobbying activity, as well as taking adequate and justified actions to achieve this interest, including compliance with the ethical rules of the institution/body from which support is sought.

(2) When representing the interest of the enterprise and/or seeking support, it is inadmissible to attempt to influence the position/judgment of the relevant public authority/official through corrupt practices (including, but not limited to, offering an undue advantage, coercing a violation of ethical or administrative norms and practices, misleading, deceiving, abusing the information received). Any "hospitality" towards such an employee shall be within the limits of what is permissible according to the rules of the institution from which that employee comes.

Art. 5. (1) Persons employed at the enterprise, in accordance with their assigned functions, rights, obligations and their place in the workplace hierarchy, are obliged to know the business relationships of the enterprise and to track the origin and movement of funds received and/or paid by/to the public enterprise in order to ensure that the funds and/or the final intended use of the services provided do not originate and/or are not intended for direct or indirect illegal activity, including, but not limited to: financing of terrorism and/or other related activities.

(2) Any action of the persons employed at the enterprise that deviates from the generally accepted working mechanisms used to ensure the lawfulness of the business, including, without limitation, analysis and verification of the origin of specific payments and verification of the documents for them, identification of the payer and/or recipient of the service, assessment of their reliability, as well as other characteristics that guarantee transparency of the relationships, constitutes a violation of the norms and restrictions under this code.