



**INTRACOM**  
**TELECOM**

UN GLOBAL COMPACT  
**COMMUNICATION**  
**ON PROGRESS**

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DECEMBER 2020

WE ENVISAGE  
A WORLD WITH UBIQUITOUS  
BROADBAND COMMUNICATION  
ENABLING INNOVATIVE,  
LIFE IMPROVING SERVICES

## CEO STATEMENT

This year, Intracom Telecom was called to face the global pandemic of COVID-19. I am proud of the way our company has reacted to this significant challenge, looking after the health and safety of our employees around the globe with responsibility, as our people are our top priority.

Our company has effectively responded to the current situation and by extending our membership to CSR Hellas and Global Compact Network Hellas, we remain fully aligned with the 10 Principles of the United Nations Global Compact. It is our commitment to keep conducting business in respect to human and labor rights, the protection of environment and anti-corruption.

Particularly, I want to share below some of our highlighted actions that took place during the pandemic in 2020:

- » We implemented additional measures, on top of those imposed by the Greek State, and reformed our employee benefits to successfully support their health and safety and provide them with flexibility in order to adjust to the new conditions.
- » We donated five advanced portable telemedicine kits to Greece's Ministry of Health, contributing to the effective monitoring and management of any potential ad-hoc needs, especially in remote and isolated areas. This donation was related also with our participation in the National Telemedicine Network (EDIT) project.
- » We managed to deliver our products and services uninterrupted, maintaining our company's business continuity.

The post-pandemic era will be different, and while we are patiently waiting the present situation to reach to an end, we are preparing to address the future challenges. Our priority remains to contribute to the on-going battle against COVID-19, committing to continue developing innovative technologies that enable life improving services and last but not least, assuring the health and safety of our people.



**Mohamed Ahmed**  
CEO  
Intracom Telecom



LOCAL PRESENCE | R&D CENTERS | PRODUCTION FACILITIES

# THE GROUP

At Intracom Telecom, we work towards fulfilling the vision of a smarter connected world, where cutting-edge technologies in the areas of information and telecommunications technologies will play a key role in the enablement of life improving services for the growing population. Intracom Telecom is acknowledged as a company that produces high technology with “from-idea to-market” capability.

Intracom Telecom, a global telecommunication systems & solutions vendor, was derived from Intracom, a company that began operating back in 1977 in Athens, Greece, manufacturing and assembling telecommunication equipment to address domestic needs. In 2005, Intracom was transformed into a holding company and the telecommunications business unit became a company under the name Intracom Telecom.

During its four decades of accumulated experience, the company has successfully participated in major ICT projects worldwide and has received awards and distinctions for its technologies and work environment. Today, Intracom Telecom employs over 1,800 highly-skilled professionals and operates its own R&D and production facilities. The company has local presence in Europe, Russia & the CIS, the Middle East & Africa, Asia and North America.

Intracom Telecom has extensive know-how and a proven track record in the telecommunications market, serving more than 100 renowned customers in over 70 countries. The company develops and provides products, solutions and professional services primarily for fixed and mobile telecom operators, public authorities and large public and private enterprises.

The company's core business offerings include:

- » Wireless Access & Transmission
- » Telco Software Solutions
- » ICT - Smart City & Surveillance Solutions
- » Energy Solutions



17

counties with  
local presence



3

R&D  
centers



1,800

employees  
worldwide



73%

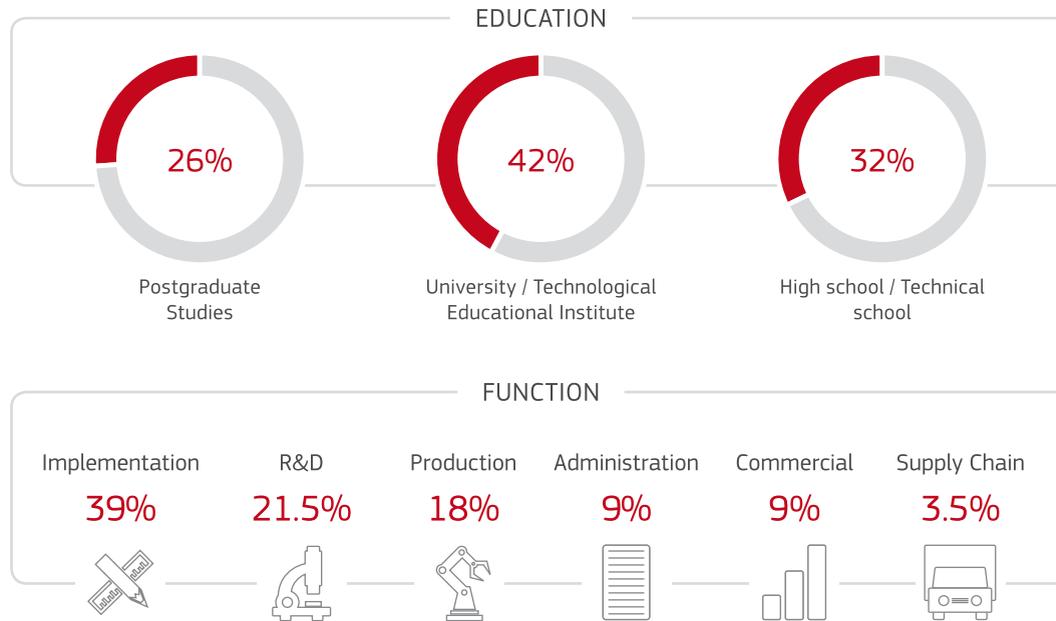
international  
activities

# OUR PEOPLE

We, at Intracom Telecom, recognize that our people are at the core of all of our business. The company's highly specialized and experienced employees are pivotal to achieving demanding objectives and advancing the capabilities of the company to better serve its customers.

Intracom Telecom offers a fast-paced, success-oriented and rewarding working environment fuelled by the talent and skills of its people who are among the best in the industry. Intracom Telecom creates trends in information and communication technologies and maintains its market growth and leading position through a committed focus on employee training.

The success of our products and solutions globally and our focus on the R&D of cutting edge technologies make our company a pioneer in creating and maintaining specialized employment within the country contributing significantly to the enhancement of our "Domestic Intellectual Capital". It is worth mentioning, that currently approximately 300 employees who were educated or worked abroad, upon their return to Greece selected Intracom Telecom as an employer.



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Data available as of October 31, 2020.  
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# OUR R&D

Dedication to R&D and commitment to technology innovation is at the foundation of the company's business strategy. Intracom Telecom invests significantly in R&D programs developing cutting-edge products and competitive solutions on an international level. Intracom Telecom operates its own R&D and production facilities in the European Union and has a strong participation in the European Union's (EU) flagship initiative for 5G, as well as a significant involvement in the EU Horizon 2020 research framework. Intracom Telecom maintains strategic R&D partnerships with major technology vendors and leading academic institutions globally, jointly conducting research and development of new products and services.

The company currently participating in all phases of development of 5th generation networks with the projects SPEED-5G, CHARISMA, VirtuWind, BlueSpace, 5G-VINNI, 5G-VICTORI and 5G- HEART. It has been particularly successful in the first phase of research for technologies beyond 5G, with participation in the projects TERRANOVA, ARIADNE, TERAWAY, 5GZORRO, through which the EU promotes the development of technologies for next generation (6G) networks.

In this framework, our R&D team received the Best Paper Award from EuCNC 2020 Awards Committee, for the "Real-time Experimental Wireless Testbed with Digital Beamforming at 300 GHz". The publication referred to the results of a world's first demonstration achieved in the framework of the H2020 project TERRANOVA, which aimed to study the radio transmission technology in the THz band and its interconnection with optical networks in "Beyond 5G" scenarios.

In 2020, Intracom Telecom was also recognized by Intel's Winners' Circle Program as a Solution Plus partner for its contribution to the acceleration of 5G and virtual network transformation and by working closely with Intel and Intel Network Builders ecosystem.

In the framework of R&D innovation, the company has been identified as a "best positioned supplier" for Telecom Infra Project's (TIP) OpenSoftHaul (OSH) global RFI, coordinated by the Wireless Backhaul Project Group (WBH PG), which in turn is organized and backed up by Axiata, Deutsche Telekom, MTN, Telefónica, and TIM Brasil.

Our dedication to Research and Development along with our skilled personnel worldwide enable Intracom Telecom to create technology that is shaping the future.

# OUR SOCIAL RESPONSIBILITY

Strongly committed to the values of Corporate Social Responsibility, Intracom Telecom endorses United Nations Global Compact and actively supports the growth and advancement of CSR in Greece, by participating as an active member in CSR Greece and Global Compact Hellas associations. We are committed to conducting our business in an environmentally sound and sustainable manner, safeguarding pollution prevention, providing excellent workplace conditions and being committed to the communities in which we operate.



HUMAN RIGHTS



LABOUR RIGHTS



ENVIRONMENT



ANTI-CORRUPTION



## HUMAN RIGHTS

### PROTECTION MEASURES AGAINST COVID-19

Our people are our greatest asset, thus during the pandemic, their health and safety is considered as an integral part of our corporate culture. Coping with the coronavirus pandemic, we made all necessary arrangements to keep every employee working in the safest possible way. Our action plan included additional measures on top of the Government's decisions/directions, as the following:

- » We decided to withdraw at early stages (February), our participation in international exhibitions starting from MWC Barcelona 2020. This measure was taken proactively, in order to eliminate the risk of exposing our employees, associates and stakeholders to COVID-19. Moreover, throughout the year our employees were traveling only in emergency/urgent cases.
- » Remote working status was implemented at early stages at higher percentages than those imposed by the State.
- » Continuous updates through notifications to our employees. Indicative topics include: social distancing and hands hygiene, use of the protection mask in company's premises and buses, traveling guidelines, medical instructions, mail & packages handling, visitors handling.
- » Continuous support & communication with our Occupation & Physician Office.
- » Provision of individual protection equipment (face masks, antiseptic liquids, gloves) to our employees.
- » Implementation of the full scale plan to deal with possible cases including a variety of procedures such as: departure from the company's premises even in the case of minor symptoms, isolation room, tracking of employees, conduction of tests to close contacts, disinfection of buses and company's areas.
- » Restructuring and enhancement of corporate bus routes in order to minimize the use of public transportation means of our employees.
- » Temperature measurement of employees & visitors entering the company's premises & buses.
- » Partial suspension of the operation of our in-house restaurant at early stages of the pandemic. Only take away service was available, in order to prevent any risk related to the virus.
- » Implementation of an Employees' Notification System in emergency cases, via SMS to their mobile phone device.
- » Implementation of meetings though applications such as Skype, Webex, and avoidance of physical meetings.
- » Creation and training of a First Aid team.
- » Implementation of compulsory remote working status for one week upon return from vacations.

## OUR CONTRIBUTION TO THE BATTLE AGAINST THE PANDEMIC

As the COVID-19 pandemic spreads globally and the confirmed cases in Greece are moving upwards, it is our responsibility to contribute to the on-going battle against COVID-19, by supporting the Government's efforts. Intracom Telecom decided to donate the most advanced portable telemedicine kits to the Ministry of Health to further equip the emergency response personnel in addressing a variety of medical situations with speed, efficiency and quality of service. The portable telemedicine kit is a carry-on suitcase that supports a large number of digital medical devices, which are connected to Greece's National Telemedicine Network (EDIT) network, giving thus more mobility and flexibility with high precision, so as to transmit patients' health indicators to the interconnected hospitals and receive the appropriate medical instructions in real time.

This donation was related to our participation in the EDIT project that connects 71 telemedicine installed fixed stations in the Aegean islands with central hospitals of the 2nd Regional Healthcare Administration of Piraeus & the Aegean. This will digitally simulate the physical presence of the doctor in the place where the patient is located, and it will eliminate distances between the most remote islands and major hospitals, limiting thus pointless travel and air medevacs, while decongesting clinics. EDIT contributes significantly to the upgrade of Health services for islanders, as well as to the reduction of pointless patient travel and air medevacs to urban centers.

## HEALTH AND SAFETY (OHSAS 18001:2007) STANDARD

Intracom Telecom is fully committed to provide a healthy and safe workplace to its employees. This philosophy is best represented by our certification to OHSAS 18001:2007 Occupational Health and Safety Management System, which ensures that all Health and Safety regulations are strictly followed in the workplace, enables the company to identify & control health as well as safety risks, prepares Emergency Response plans and improves its overall performance. Moreover, all new employees attend orientation seminars aimed at familiarizing them with all the security measures. On June, Intracom Telecom also received, the Golden Award at the Health & Safety Awards 2020 for the H&S training program "Spot the Risk!" - a video game used as an H&S Culture Development tool. Having as a goal to further reduce work accidents and prevent occupational diseases, Intracom Telecom, in the framework of the annual improvement of its H&S programs, developed an educational video game that can serve as a vehicle for transferring knowledge on how to immediately recognize the possible health & safety risks when entering an office and avoid or neutralize them. Through an easy & fun way, the company efficiently passes on knowledge and workplace safety culture on H&S guidelines to its employees.

## SOCIAL GROUPS IN NEED

Since 2005, Intracom Telecom has focused its financial support on non-profit organizations which provide protection and care to social groups in need, especially children. We have a long-term collaboration with nonprofit child welfare and protection organizations, such as "The Smile of the Child", "Educational Centre for People with Disabilities in Piraeus", "Doctors of the world", and "Ark of the World". This year, due to the developments regarding the COVID-19 outbreak, the company contributed financially to these three organizations and encouraged its employees to support their seasonal bazaars with online orders. Moreover, the company continues the collection of bottle caps on behalf of the Association of Paraplegic and Handicapped of Pellas Prefecture in order to exchange them with wheel chairs for the Association's members.

## REFURBISHED PC DONATIONS

We continue to donate IT equipment to public schools and non-profit organizations in Greece in order to offer to their students, members and stakeholders an easier access to knowledge. In total, we have donated more than 850 refurbished personal computers. This initiative started more than 10 years ago to bridge, to some extent, the gap between technology education and lack of appropriate infrastructure. However this initiative has an environmental aspect too, since the choice of extending the life use of these PCs results to reduction of the amount of waste sent to landfills. Where donation is not feasible, we ensure the responsible recycling of all equipment.

## ENHANCING YOUTH'S EDUCATION

Intracom Telecom supports the role of education in society that prepares the next generation of leaders and scientists. Within this framework, we educate budding scientists by supporting the European Pact for Youth initiative, launched by CSR Europe and the European Commission, inviting businesses, social partners, education & training providers, employment services and parents to develop and consolidate partnerships in support of youth employability and inclusion. During the last years, by offering our sponsorships to the student associations EESTEC, BEST and IEEE we managed to organize workshops for university students in Athens, Thessaloniki and Patras in order to share our professionals' technical knowledge. In 2020, we also participated in the virtual conference of Patras Codecamp 2020, organized by InterMediaKT and POS4work - Point Of Synergy, giving a brief presentation on the challenging & rewarding working environment of Intracom Telecom. Also in February, DIEK Agrinio, through the Erasmus+ KA202 program, travelled to Romania, where it visited Intracom's facilities. The Greek students' group took a tour around the company's offices, as well as the manufacturing area, witnessing Intracom's impressive infrastructure and the great dynamic and potential of the company. This was an excellent opportunity for them to explore and compare first-hand good practices in the IT and telecommunication sector. Additionally, in our recruitment process we include our active participation to career fairs. We are actively involved in career days hosted by the Greek Universities and our support of the Gefyra initiative, successor of the European Pact for Youth program, is steadfast. We have also created an annual framework for university internships and traineeships in various scientific fields in our company. Intracom Telecom also offers to university graduates the opportunity to participate in research projects as part of their thesis.

## BUSINESS CONTINUITY PLAN

No one can predict the future, but we can certainly be prepared for it and that is what we aim in Intracom Telecom with our Business Continuity Planning. Our ISO 22301 certified Business Continuity Plan outlines procedures and instructions that the organization must follow in the face of an emergency or disaster in order to ensure that business processes, procedures, assets and human resources can continue operating during and after this time. This year, faced with the coronavirus pandemic, we managed to deliver our products and services uninterrupted, maintaining our company's business continuity. Our goal is to be a well-organized and proactive organization that ensures the health & safety of its employees and 2020 gave us the opportunity to demonstrate that.



## LABOUR RIGHTS

### EXCELLENT WORK ENVIRONMENT

Our people's well-being is our key factor in determining Intracom Telecom's long-term effectiveness and sustainability. The biggest reward and success of our company is our employees' job satisfaction and their continuous development that will assist them in reaching their highest potential. Within this framework, we offer benefits to all employees such as: free employee and subsidized family medical insurance plan, free transportation on company buses, free parking on company premises, flexible working hours and restaurant in our premises with competitive prices for our employees.

### FAIR HUMAN RESOURCES OPERATIONS

It is the policy of Intracom Telecom to maintain a work environment free of unlawful discrimination for all employees. Our Human Resources Management System and its subsystems, including recruitment & succession planning, career development, performance and rewards management, training and development, are in full alignment with our corporate principles of equal opportunity and meritocracy. Our company applies policies for equal opportunities ensuring that all employment decisions are irrespective of caste, national origin, religion, disability, gender, sexual orientation, union membership, political affiliation or age. Given this framework, an 8% of Intracom Telecom Group's employees are people who belong in categories such as: parents or members of multi-child families, disabled people or relatives of disabled people, etc. Promotions are awarded once a year as part of the annual performance appraisal procedure and employees are rewarded according to their performance and their individual contribution towards achieving the company's goals. We are hiring with meritocracy, using criteria as academic qualifications and skill sets, with candidates taking written exams during a regularly organized assessment center process.

## FREEDOM OF ASSOCIATION

In Intracom Telecom, employee trade union rights are respected and all employees are free to join trade unions or similar external representative organizations. The Employees' Union is active with approximately 70% of our employees being union members.

## INVESTING IN OUR EMPLOYEES

We realize that the best work comes from an environment that fosters innovation and development. We remain committed to investing in our employees' professional and personal development, with lifelong learning opportunities that further developing their skills. We achieve that with continuous in-house and off-site training, determined by the challenges they have to face regarding their job. In 2020, we invested in more than 4,700 training hours on over 370 employees throughout the Group, mainly through webinars. In addition, we show our trust in our talented employees and their postgraduate studies by providing them with financial support.

## INTERNAL COMMUNICATION

Intracom Telecom's culture of sharing and collaboration is also supported by keeping up to date our employees. Our employees are updated in a weekly basis, through our company portal, bulletin boards, e-mails, staff meetings and corporate publications. In "Interact", our company portal, they can find information i.e. latest news and announcements, useful links about daily life, guidelines, internal services procedures and company's policies. Within this year, faced with the COVID-19 pandemic, the need to be in close contact with our people is more crucial than ever. For this reason, we provided our employees with continuous updates about traveling guidelines, medical instructions, mail & packages handling, visitors handling, use of the protection mask in company's premises and buses, social distancing and hands hygiene. We also implemented an Employees' Notification System in emergency cases, via SMS on their mobile phone device.



## ENVIRONMENT

### ENVIRONMENTAL MANAGEMENT SYSTEM (ISO 14001:2015)

Intracom Telecom is committed to conducting its business in an environmentally sound and sustainable manner and takes precautionary measures to protect the environment and minimize any negative environmental impacts that may result from its daily operations. The company defines and documents identification and evaluation methods of all environmental aspects of its operations and their associated impacts. Evaluation is performed against predefined criteria including legislative and other regulatory requirements. Emergency Response Plans are designed to secure prevention and mitigation of the associated environmental impacts. The company has established an Environmental Management System (EMS) which is certified in accordance with the international standard ISO 14001:2015 and is integrated with the ISO 9001:2015 (Quality), OHSAS 18001:2007 (Health and Safety), ISO 27001:2013 (Information Security) and ISO 22301:2012 (Business Continuity) based Management Systems. The company is subject to assessments by an independent certification body for its compliance with the abovementioned standards. The company seeks continual improvement by setting specific environmental objectives based on identified environmental impacts, on compliance obligations and on risks and opportunities, and by monitoring and documenting the achievement of these objectives. Intracom Telecom recognizes that environmental responsibility is crucial to its long-term success. Developing, manufacturing and marketing products that are not energy demanding and can be reused, recycled or safely disposed, as well as using environment-friendly manufacturing methods and enhancing employee awareness and training, contribute to the company's aim towards sustainable development.

## PARTICIPATION TO COLLECTIVE ALTERNATIVE MANAGEMENT SYSTEMS

Procedures for recycling and reusing materials are applied at all facilities. The company participates in the nationwide Collective Alternative Management System - "RECYCLING" (organized by "HE.R.R.CO") for the collection, sorting and recycling of used packaging materials and in Collective Systems for the operation of Alternative Management of WEEE in Greece ("APPLIANCES RECYCLING S.A.") and other European Countries, fully adhering to the EU directive on waste electrical and electronic equipment (recast WEEE directive - 2012/19/EU).

## WASTE MANAGEMENT

Intracom Telecom's waste is collected by authorized companies. Indicatively, waste includes used electrical and electronic equipment (e.g. PCs of no further use, rejected finished or semi-finished products, etc.), building installation lighting, non-usable cables, metals (e.g. iron, aluminum, etc.), timber (e.g. pallets, wooden reels, etc.), packaging waste (e.g. cardboard, plastic bags, etc.), printed material, lead batteries (e.g. from uninterruptible power supply units-UPS), small batteries, etc. Depending on their physical and chemical properties, waste produced is collected by authorized companies and delivered to authorized facilities for provisional storage, sorting, recycling, treatment, recovery or disposal. In 2020, the tonnage of non-hazardous waste was about 23 tonnes, while the tonnage of collected hazardous waste was about 16.5 tonnes<sup>(1)</sup>.

## ROHS DIRECTIVE

Intracom Telecom has taken all necessary steps to ensure that its products comply with the EU directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment (recast RoHS directive - 2011/65/EU and its amendments e.g. Commission delegated directive (EU) 2015/863).

## GREENHOUSE GAS EMISSIONS

Intracom Telecom calculates and monitors greenhouse gas emissions produced from the company's activities, using internationally approved calculation standards for greenhouse gas emissions such as "The Greenhouse Gas Protocol" etc. In 2020, the CO<sub>2</sub> emissions were 3,978 tonnes<sup>(1)(2)</sup>. For the tenth consecutive year Intracom Telecom, participated to the Carbon Disclosure Project (CDP) initiative and reported on its carbon footprint.

## ENERGY SAVING

Intracom Telecom has undertaken a line of action that contributes to energy saving and the minimization of climate change impacts. Indicatively, the company performs preventive maintenance on equipment and electrical networks, regulates electrical parameters, operates building service equipment (e.g. air-conditioning units, lifts etc.) in an environmental friendly manner, uses video-conference equipment, which reduces the number of business trips required, uses integrated information systems aiming to restrict the consumption of paper, hires coaches for the transportation of personnel from central points in the city to Intracom Telecom, etc.

(1) Data available as of September 30, 2020.

(2) From combustion of purchased diesel oil and natural gas for heating and purchased electricity.

## ECOLOGICAL DESIGN OF PRODUCTS

Intracom Telecom is paying close attention to the latest trend developments in the ICT field, and keeps its personnel informed and aware on the fundamentals and practices of ecological design. Indicatively, design fundamentals concern:

- » the reduction of the use of virgin materials that is harmful to the environment and the promotion of the use of recycled materials where technically and economically feasible
- » the capability of repairing and upgrading of products in order to extend their lifespan
- » the capability of products to be fully or partially disassembled and reused aiming to facilitate the recycling process and reduce the volume of waste
- » the provision of instructions for the end-user regarding the management of equipment at the end of its lifecycle, etc.

## CONTRIBUTION TO SUSTAINABLE DEVELOPMENT

### » E-LAND project

Intracom Telecom is a member in E-LAND project – funded by Innovation and Networks Executive Agency of the European Commission - which aims at preventing climate change and strengthening resilience to pervasive and ever-increasing climate-related hazards. Intracom Telecom develops a toolbox that helps to manage multi-vector local energy systems (MV-LES).

### » Smart City vision

By offering various Smart City applications / solutions as well as its updated version of the Unified IoT Orchestration Platform (uiTOP™), which creates a unified environment for advanced management and control of smart devices and sensors in various areas, such as lighting, parking, waste management, environment, energy and utilities, Intracom Telecom strengthens the environmental profile of the municipalities improving the daily lives of citizens and protect the environment.

### » FEVER project

The new EU collaborative project FEVER addresses the topic of “Building a low-carbon, climate resilient future by promoting the adoption of secure, resilient and efficient energy infrastructures”. Intracom Telecom, as the coordinator of FEVER will implement a set of goal-oriented applications and tools that empower DSOs with optimal grid observability and controllability.

## EMPLOYEES’ ENVIRONMENTAL AWARENESS

Intracom Telecom aims to increase its employees’ environmental awareness through induction activities, reviews and audits. Employees are informed about the company’s environmental policy, and relevant activities and initiatives, such as the waste management processes implemented, during the induction seminar at the beginning of their employment. Notifications and reminders to the employees are circulated and published in the company’s intranet.



## ANTI-CORRUPTION

### CODE OF BUSINESS ETHICS

As a global company, we recognize our responsibility to uphold and instill the ethical treatment of all persons working on our behalf and apply corporate laws and practices fundamental to our business in every country where we operate. Intracom Telecom's Code of Business Ethics sets forth the company's position on fundamental legal, ethical and social matters, determines the way it operates around the world and applies to all employees and external consultants, regardless of position or location. The Code offers clear guidance and sets certain non-negotiable standards of behavior that must be adhered to when interacting with coworkers, customers, suppliers, partners, shareholders, communities and public or state authorities, while it is also communicated to suppliers and external consultants. The Code covers topics like compliance with laws and regulations, dealing with conflict of interest, proprietary information, dealing with competition, bribery & anticorruption, political contributions, integrity, record keeping, company property, human rights & labor practices, health & safety, environment, leading by example, compliance and code violation reporting.

### WHISTLEBLOWING

Intracom Telecom is committed to the highest standards of openness, professional integrity, accountability and transparency. Within this scope, we have implemented a whistleblowing mechanism to enable employees in Intracom Telecom, as well as other interested parties, such as consultants, customers, suppliers and partners, to report any concerns about wrongdoing or serious malpractice that affect the company, in a responsible and effective manner. There are three available whistleblowing channels (via telephone, email and post) through which such concerns/allegations can be expressed, without fear of reprisal. The policy is designed to enable confidential disclosures without fear of retaliation.

## GDPR & ISO 27001 INFORMATION SECURITY MANAGEMENT SYSTEM

In 2018, in the context of the new European Union General Data Protection Regulation (GDPR), we created a strong GDPR strategy. We have our systems and procedures upgraded in order to be compliant with the new regulations and we have strengthened our privacy and data protection policies. Furthermore, we are certified with the ISO/IEC 27001 Information Security Management System, emphasizing the need for an ethical reflection on the digital environment and fundamental rights. In Intracom Telecom we face data security as something more than just a legislation. We believe it's a dynamic field that requires respect and a continuous effort for improvement.

## EMPLOYEE HANDBOOK

We have issued an Employee Handbook which is posted on the company's intranet and contains information about company's policies as well as guidelines, expectations and procedures regarding employees' conduct and responsibilities. It is also vetted and approved by Greek public authorities. Among other key issues, the handbook underlines that employees are not allowed to accept payments, gifts, bribes and other benefits or privileges offered to them or their relatives. All new employees attend onboarding orientation seminars that cover corporate policies and procedures, including anti-corruption policies.

## DISCIPLINARY ACTIONS

Our goal is to achieve the highest ethical standards of global citizenship and compliance, both internally and across our business activities. For this reason, we need to enforce disciplinary actions when an employee violates provisions of the Code of Business Ethics and/or the Employee Handbook. The disciplinary actions to employees are imposed by the Management of the company. In 2020, no disciplinary actions were imposed on employees for corruption cases.

## COMPLAINT PROCESS

In Intracom Telecom we have implemented a complaint mechanism in which all information regarding any specific incident will be kept confidential within the necessary boundaries of the fact-finding process. No reprisal or retaliation against the employee reporting the unethical incidents will be tolerated. All employees can raise a complaint, following a process which is described in the company's Employee Handbook and the Code of Business Ethics.

## INTERNAL AUDIT

Internal audit can assess the effectiveness of anti-bribery and anti-corruption programs to help anticipate the risk, and identify the existence of potential and actual incidents. Within this framework, we have in place auditing mechanisms, audit committees (permanent and ad hoc), as well as internal control procedures in order to assure that risks are minimized and all activities are carried out in accordance with the corporate policies. All employees are strongly encouraged to talk to the Internal Audit Director or company's Management about any behavior they believe may breach the Code of Business Ethics and about the best course of actions that can be followed in an anti-corruption direction.





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