

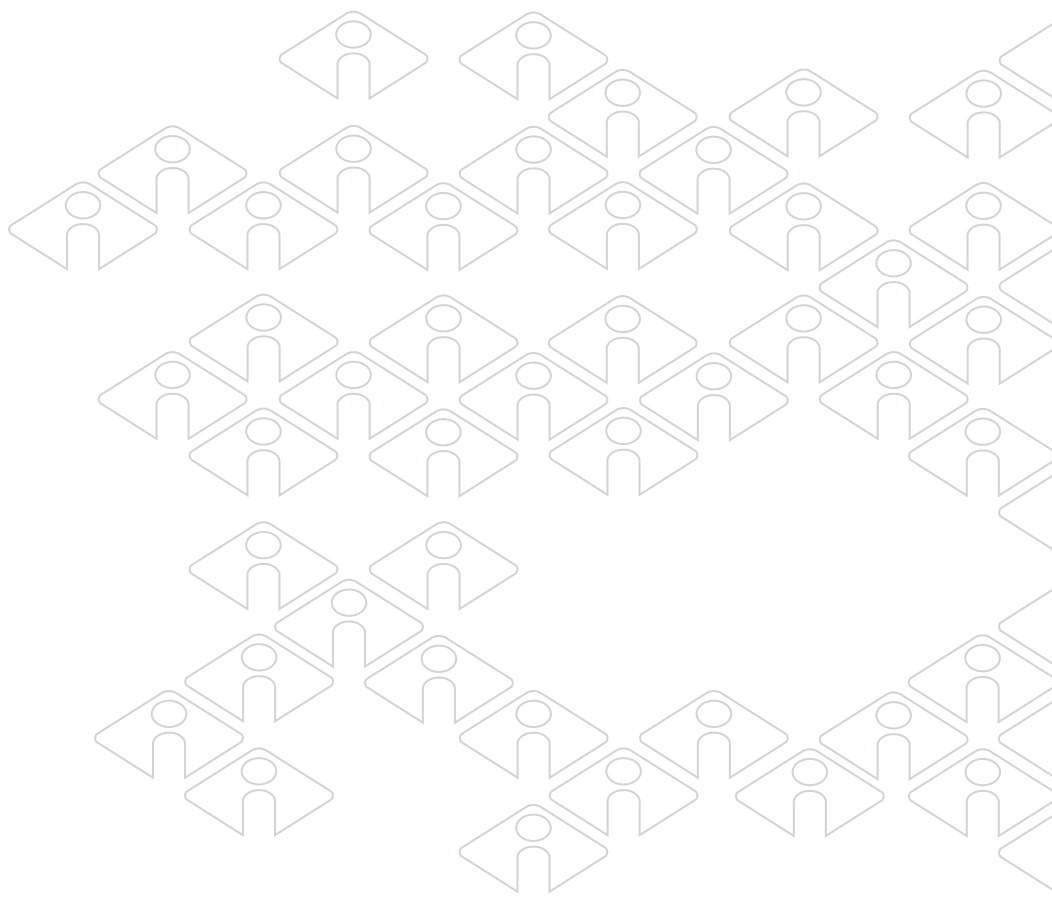
UN GLOBAL COMPACT

Communication on Progress 2021



INTRACOM
TELECOM

**We envisage a smarter
connected world where
advanced technology
enables innovative, life
improving services.**



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KARTLOS EDILASHVILI
Acting Managing Director (CEO)

CEO STATEMENT



2021 has been a challenging year, calling for decisions on managing the impact of the pandemic and its consequences and adapting to new realities. We are proud of Intracom Telecom's progress in a very challenging year and we continue to raise the bar for what we can accomplish—and the speed at which we act. With our people remaining our top priority, we are now expanding our focus on helping our clients and partners more fully embrace sustainability. This year we proudly renew our commitment of support in alignment with the 10 Principles of the United Nations Global Compact in respect to human rights, labour rights, the protection of environment and anti-corruption, and we affirm we will continue our membership to CSR Hellas and Global Compact Network Hellas.

It is noteworthy that in 2021:





- » We continue to implement additional measures, on top of those imposed by the Greek State, and we transformed our work schedule through a rotated remote work plan (enabling more than 80% remote working for Employees capable of working remotely) to successfully support our Employee's health and safety and provide them with flexibility in order to adjust to the new conditions.
- » We sponsored Aristotle University of Thessaloniki (AUTH) with regards to an innovative research program focusing on Multiple Sclerosis (MS) Disease treatment. This project aims at creating a high precision in-ear sensor that will continuously capture relevant vital signs in everyday life and provide useful data for the treatment. The first research results are expected to be released within 2022.
- » Acknowledging the urgent global challenge of climate change, we have taken measures to align our policy with the Paris Agreement and reduce our carbon footprint.

The outbreak has and still is impacting all industries, including the Information & Communication Technology sector so it remains our priority to contribute to the on-going battle against Covid-19, committing to develop innovative technologies to meet the future challenges while maintaining our company's business continuity by contributing to our customers and partners' success.

I am confident that Intracom Telecom team is capable not only to adapt but to thrive on change and continue delivering excellence.





-
-  Local presence
 -  Technical Assistance Centers
 -  R&D facilities
 -  Production facilities



17
countries with
local presence



3
R&D
centers



1,800+
employees
worldwide



73%+
international
activities

THE GROUP

For all of us at Intracom Telecom, our 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, remains undiminished. Our expertise in producing state-of art technological products and services with “from-idea to-market” capability has been acknowledged all these years from our partners and clients around the world.

Intracom Telecom was derived from Intracom, a company that began operating 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. Nowadays, Intracom Telecom employs over 1,800 highly-skilled professionals and company’s core business offerings include:

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

Dedication to R&D and commitment to technology innovation is at the foundation of our Company’s business strategy. We operate our own R&D and production facilities and invest annually 10% of our revenue in R&D programs developing cutting-edge products and competitive solutions on an international level. We have a strong participation in the European Union’s (EU) flagship initiative for 5G and maintain strategic R&D partnerships with major technology vendors and leading academic institutions globally.

Through our advanced products and solutions, the implemented projects, and the registered international patents, Intracom Telecom is acknowledged as a company with exceptional “from-idea-to-market” capability. The company is also excelling in the development of software for third parties, being recognized for its performance and excellence.

The company has local presence in Europe, Russia & the CIS, the Middle East & Africa, Asia and North America. Our know-how and the proven track record of our large scale projects with more than 100 renowned customers in over 70 countries has made them considering Intracom Telecom as experts in the telecommunications market. 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.

“

Our people are our main competitive advantage and they contribute decisively to the strengthening of our Company's position and its further development in Greece and abroad. It remains our goal to continuously create new highly specialized jobs and actively participate in the improvement and development of our country's "Human Capital".

”

MICHALIS PROUNTZOS
Group HR Director

OUR PEOPLE

Throughout Intracom Telecom history, our people have embraced constant change. Fiscal 2021 was no different. Last year—despite an unprecedented health, economic and social crisis—our more than 1800 people around the world demonstrated their dedication, resilience and commitment to our clients and creating shared success for all our stakeholders. Facing multiple crises, our top priorities were the overall safety, health and well-being—both physical and psychological—of our people and their families, along with contributing to the recovery and vibrancy of our local communities. One of our primary goals is to lead with compassion and humanity—to help our people be their best professionally and personally—and this took on a deeper meaning and sense of urgency this past year. We supported our people personally with new virtual tools and initiatives to ensure they were seen, heard, connected and productive, as well as to help cope with the demands and stresses of the compounding crises and to strengthen their mental resilience. We took decisive action to reaffirm that Employee training will not stop during the pandemic and the company will continue to support Employee wellbeing. At the same time, we remain focused on supporting our people professionally, equipping them with leading-edge technologies, continuous learning and a supportive community to enable them to seize opportunities and resources to successfully manage their careers—and to help themselves, our clients, our communities and one another as we look ahead to a new reality beyond Covid-19.

OUR SOCIAL RESPONSIBILITY

Intracom Telecom is strongly committed to the values of Corporate Social Responsibility (CSR) and endorses United Nations Global Compact as well as actively participates as member in CSR Greece and Global Compact Hellas associations. The Group is fully aligned with the United Nations Global Compact's ten principles in the areas of human rights, labor, the environment and anti-corruption. It is committed to conducting its business in an environmentally sound and sustainable manner, safeguarding pollution prevention, providing excellent workplace conditions and being committed in finding solutions to societal challenges.



ENVIRONMENT



LABOUR RIGHTS



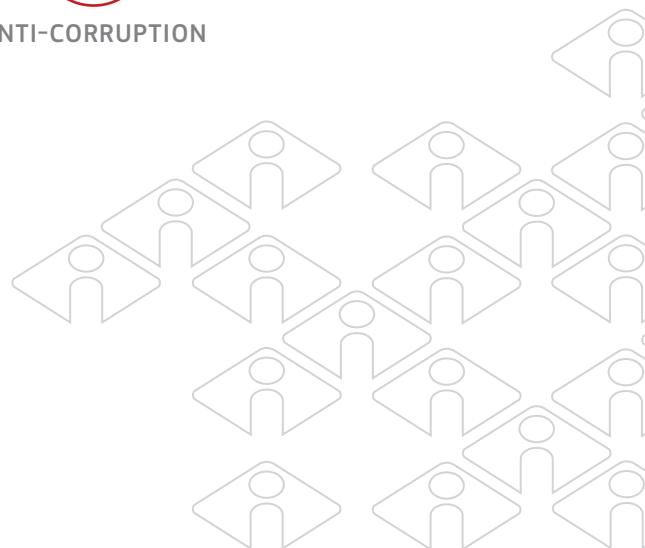
HUMAN RIGHTS



ANTI-CORRUPTION



Global Compact Network
Hellas





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), ISO 45001:2018 (Health and Safety), ISO 27001:2013 (Information Security) and ISO 22301:2019 (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 2021, the tonnage of non-hazardous waste was about 27 tonnes, while the tonnage of collected hazardous waste was about 5 tonnes⁽¹⁾.

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	The major cause of climate change is believed to be global warming, resulting from the increasing concentrations of CO ₂ and other greenhouse gases (GHGs) on earth. In order to deal with climate change, Paris Agreement came into force in November 2016, setting the target of keeping the global temperature rise below 2°C, above pre-industrial levels and calling for efforts to limit warming to 1.5°C. Intracom Telecom understands the importance of addressing and contend with climate change and has taken steps to support the 1.5°C initiative. In this context the Company is aiming at reducing its Scope 1 and Scope 2 emissions by 50% by 2030, taking 2019 as the baseline year. Intracom Telecom calculates and monitors greenhouse gas emissions produced from its activities, using internationally approved calculation standards for greenhouse gas emissions such as “The Greenhouse Gas Protocol” etc. For 2021, CO ₂ emissions have been estimated to be 3,802 tonnes ⁽²⁾ . Furthermore, Intracom Telecom has participated since 2008 in the CDP (formerly known as Carbon Disclosure Project) and has been reporting through CDP to specific customers / interested parties 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.
ECOLOGICAL DESIGN OF PRODUCTS	<p>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:</p> <ul style="list-style-type: none"> » 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**

» **REGENCY Project**

Intracom Telecom participates as the project coordinator in the “REGENCY” (Re-inventing energy efficiency for businesses) research program that started in October of 2020. It is co-financed by the European Regional Development Fund (ERDF) of the European Union and by Greek national resources, through the Operational Programme Competitiveness, Entrepreneurship & Innovation. The project aims at upgrading the services provided to business consumers, targeting to offer insightful information on their energy profile and consumption behavior, so as to achieve more efficient energy management.

» **PerManeNt Research Program**

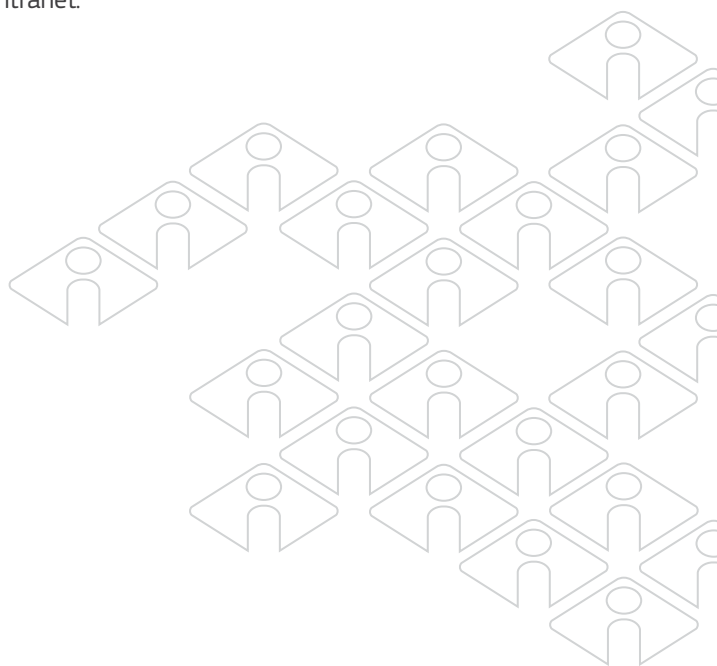
Intracom Telecom announces its participation in the PerManeNt research program that focuses on the development of an integrated platform for operational monitoring, smart control, and sustainable energy management of water supply networks. The integrated platform will be applied to the external aqueduct system of the city of Patras, Greece.

**MAKING OUR
CITIES GREENER
AND MORE
SUSTAINABLE**

The Municipality of Tirana has initiated the earth works for the creation of the Hellenic Park of Farka Lake, rehabilitating the area and enhancing the city’s sustainability. Intracom Telecom is supporting this amazing initiative and participates as one of the donors that is financing this green project. In fact, a few days ago the Embassy of Greece in Tirana proceeded with the plantation of 90 olive trees.

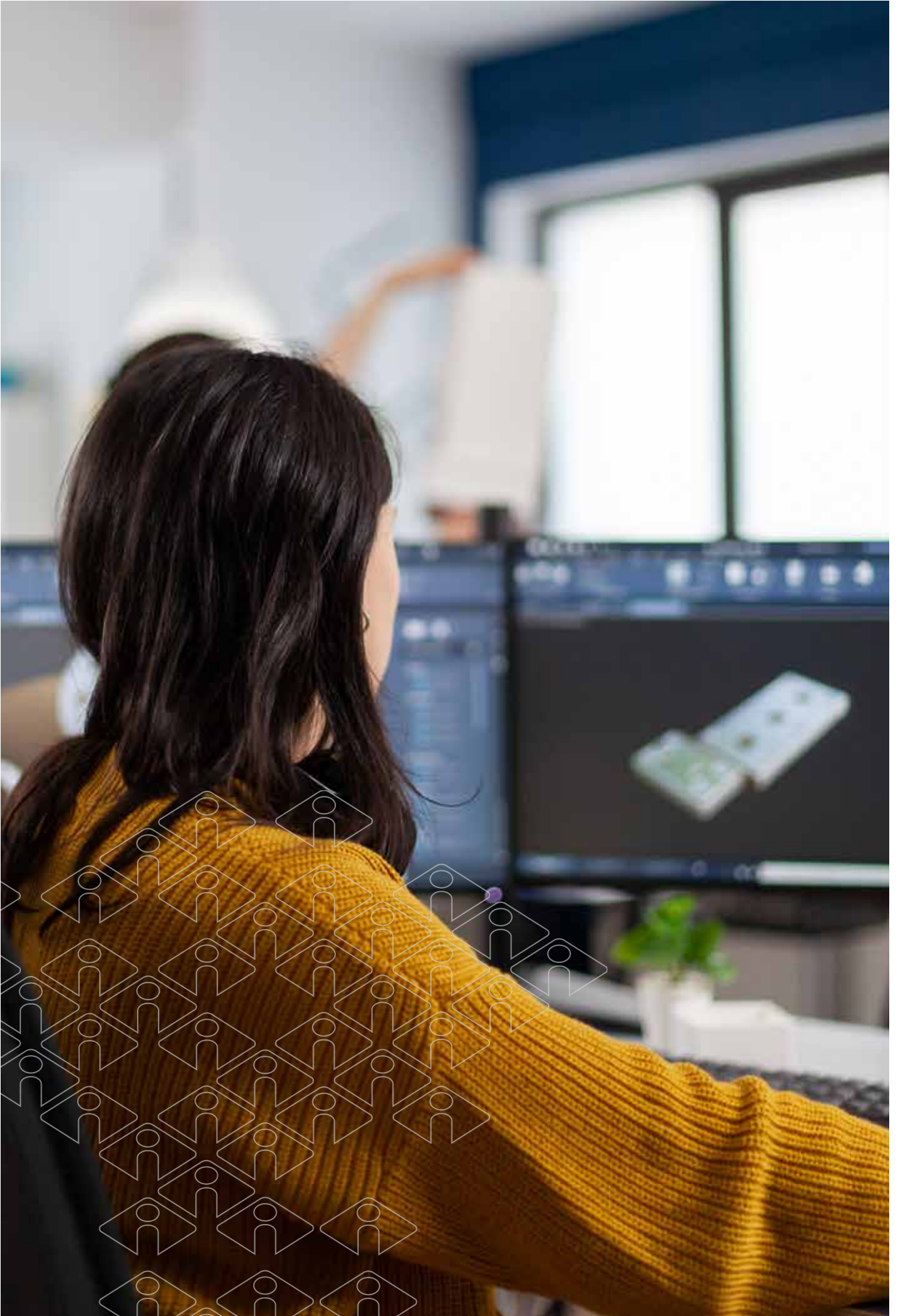
**EMPLOYEES’
ENVIRONMENTAL
AWARENESS**

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.



⁽¹⁾ Data are available as of October 31, 2021 and do not include wastes collected by municipal services.

⁽²⁾ For more information please refer to www.intracom-telecom.com/en/company/profile/ClimateAction.htm



LABOUR RIGHTS

EXCELLENT WORK ENVIRONMENT

Our Employees' 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' satisfaction about their job 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

FAIR HUMAN RESOURCES

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 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

Intracom Telecom's culture focuses on the lifelong learning of its Employees and the attraction of highly qualified professionals in Greece and abroad. The company offers lifelong learning opportunities to all Employees with continuous in-house and off-site training, determined by the challenges they have to face regarding their job. In 2021, more than 4,800 training hours were invested on 288 Employees throughout the Group.

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 these 2 years of unprecedented challenges the need to be in close contact with our people became our first priority. For another year we continued to provide 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, vaccination campaigns, social distancing and hands hygiene. We also implemented an Employees' Notification System in emergency cases, via SMS on their mobile phone device.

HUMAN RIGHTS

ACTION PLAN AGAINST COVID-19

Our talented people are our most important source for competitive differentiation, thus during the pandemic their health and safety is contemplated as an integral part of our company culture. Dealing with Covid-19 pandemic, we made all necessary amendments to keep every Employee working uninterrupted in the safest possible way. Intracom Telecom's readiness for social solidarity, which expresses a general attitude of humanity, mutual assistance, understanding and reciprocity, has determined the company's direction in the era of the global corona virus pandemic. For 2021, Intracom Telecom, remained true to its commitment to continue long-term investment in the community, and in keeping with the new circumstances, key projects were implemented, and humanitarian actions were initiated in the area of health and social protection. On top of Greek Government's directions, our action plan was enhanced with additional measures and humanitarian actions in the field of health and safety, as the following:

- » Remote working status continued to be implemented at higher percentages than those imposed by the State. We implemented a rescheduled rotated work plan in order to enhance Employee's physical energy, mental focus, value and sense of purpose.
- » We continued to supported our people personally with new virtual tools and initiatives to ensure they were seen, heard, connected and productive, as well as to help cope with the demands and stresses.
- » Provision for constant communication to our Employees from professionals from our Occupation & Physician Office to provide answers on questions and provide guidance based on each individual's situation. Dedicated Covid-19 emergency team, providing support and handling through an established action plan of possible Covid-19 confirmed cases on 24/7 basis.
- » Provision for additional self-tests at Company's cost for all Employees working with a physical presence.
- » Employees' Notification System in emergency cases was enhanced in order to inform Employees about Covid-19 cases in their close relationships.
- » Temperature measurement of Employees & visitors/partners entering the Company's premises & buses as well as scanning of their vaccination certificates or rapid tests.
- » Implementation of meeting through applications such as Microsoft Teams and Zoom, and avoidance of physical meetings.

HEALTH & SAFETY (ISO 45001:2018)

Intracom Telecom is fully committed to provide a healthy and safe workplace to its Employees. This philosophy is best represented by our certification to ISO 45001:2018 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.

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**

All these years our partnerships with public schools and non-profit organizations has given us the chance to provide them with 970 refurbished Personal Computers/ mobile devices enabling easier access to knowledge for students/members and stakeholders. Only this year we managed to donate 100 refurbished units to public schools and non-profit organizations in Greece. 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. It is now one of our basic principles to ensure the responsible recycling of all equipment, where donation is not feasible.

**ENHANCING
YOUTH'S
EDUCATION**

Intracom Telecom supports the role of education in society that prepares the next generation of talent. 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, IEEE and the POS4work network we managed to organize online workshops for University students in Athens, Thessaloniki and Patras in order to share our professionals' technical knowledge. In 2021, we also participated in the virtual conference of the Institute of Electrical and Electronics Engineers (IEEE), sharing with students our insights in "Innovative Technologies for 5G and Beyond". Also in May in a 2 days' event, our colleagues from Patras Branch together with POS4work analyzed to University students and graduates from all over Greece, the essentials of cloud-native applications that considered "must-do" for Telcos. Additionally in November, we organised in cooperation with BEST Thessaloniki and our colleagues from our local office, a 2 days' workshop on Cloud technologies which gave the opportunity to students in Thessaloniki to come in contact with our team there, exchange opinions in real life case studies and see how the vision of Intracom Telecom for a smarter connected world where innovative technologies will enable services that will help everyday life is now possible. We have also continued to have an annual framework for University internships and traineeships in various scientific fields in our company. Intracom Telecom also offered to University graduates the opportunity to participate in research projects as part of their thesis.

**BUSINESS
CONTINUITY**

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 2021 gave us the opportunity to demonstrate the importance of clear communication in an emergency situation.

ANTI-CORRUPTION

CODE OF BUSINESS ETHICS

Intracom Telecom is committed to the highest standards of ethical behavior in all its actions and decisions. Our 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 and anti-corruption, political contributions, integrity, record keeping, company property, human rights and labor practices, health and safety, environment, leading by example, compliance and code violation reporting.

WISTLEBLOWING

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. We are committed to the highest standards of openness, professional integrity, accountability and transparency. Within this scope, we have implemented as of 2019 a whistleblowing mechanism to enable Employees in Intracom Telecom, as well as other interested parties, such as consultants, customers, suppliers and partners, to voice concerns about wrongdoing or serious malpractice that affect the Company, in a responsible and effective manner. Through three available whistleblowing channels (via telephone, email and post) our Employees can express concerns or allegations, without fear of reprisal.

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 intranet and contains information about company 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

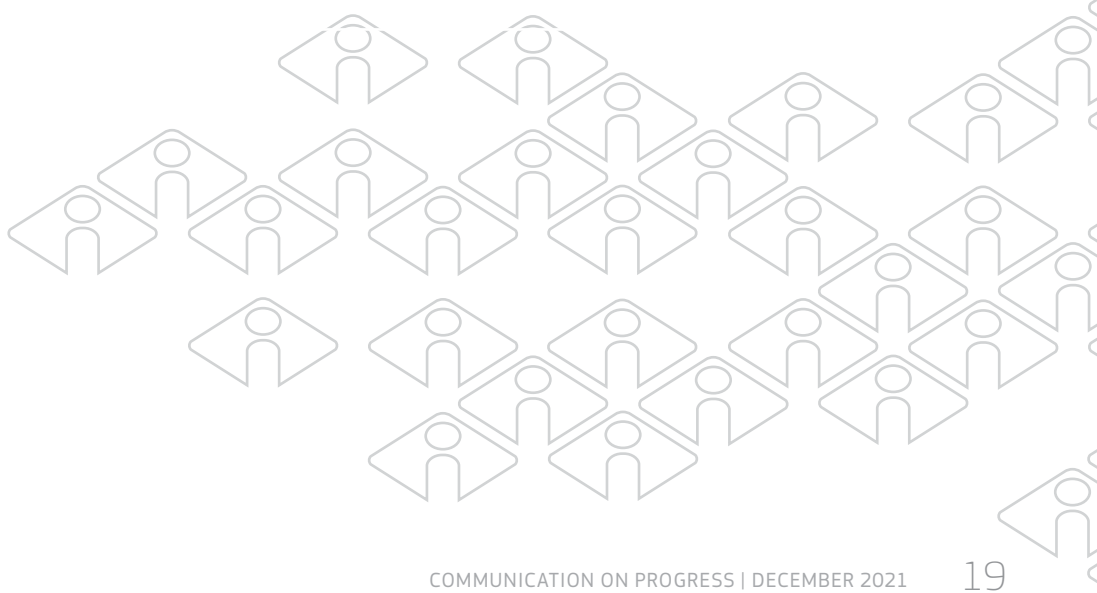
Our goal is to achieve the highest ethical standards of global citizenship and compliance, both internally and across our business activities. For this reason, we need to enforce disciplinary actions when an Employee violates provisions of the Code of Business Ethics and/ or the Employee Handbook. The disciplinary actions to Employees are imposed by the Management of the Company. In 2021, 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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