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# Code of Business Conduct

Logicom

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## 1. Introduction

Logicom Public Ltd is an international group of companies, listed on the Main Market of the Cyprus Stock Exchange and a member of the FTSE/CySE20 index. Established in 1987, the group currently employs more than 700 professionals and serves more than 10,000 customers through its wholly owned subsidiary companies in Cyprus, Greece, Italy, Germany, Romania, Turkey, United Arab Emirates, Saudi Arabia, Qatar, Kuwait, Oman, Lebanon, Jordan, and Iraq and its sales offices in Bahrain and Malta.

The Logicom Group activities include the regional wholesale distribution of Technology Solutions and Services, the provision of integrated IT Networking, Telecommunications, and Business Software Solutions, and the execution of large infrastructure projects in the areas of Water, Power, and Gas.

As a leading regional Distributor of computer systems, networking products, components and peripherals, Logicom has developed excellent relationships with the world's leading technology vendors. These include Adobe, APC, Cisco, HP, Intel, Kingston Technology, Lenovo, Microsoft, NetApp, Palo Alto, and WD. Logicom counts on operational excellence and sound long term relationships with its partners in order to provide customers with the best-in-class products and services, when and where they need them. Applying the highest standards of professionalism, Logicom is an indispensable link in the technology supply chain, facilitating mutually beneficial relationships with channel partners.

With a physical presence in Cyprus, Greece and Dubai, Logicom Services specializes in Systems Integration, ICT Infrastructure and Business Software, providing a wide spectrum of high quality Solutions and Services targeting the mid-to-high market. Its strategic partnerships with leading industry vendors ensures that it provides cutting edge solutions across all major business sectors including Government, Healthcare, Education, Communications Service Providers, Shipping, Hospitality, Banking/Finance/Insurance, Forex and SMEs.

Logicom's involvement in the field of Water, Power, and Gas began in 2008. Today Logicom participates in joint ventures with other leading organizations for desalination plants in Cyprus, through the methods BOT (Build Operate and Transfer).

The Logicom Code of Business Conduct (Code) sets the standards of business conduct for all of Logicom Group (Logicom). Throughout the Code, "Logicom" is used to refer to the enterprise as a whole, and includes all its employees, suppliers, consultants, and third-party representatives and all the Logicom entities in every country. The Code of Business Ethics applies to all Logicom people, including directors, officers and employees in every country, and entity that is part of Logicom's financial statements or otherwise controlled by Logicom.

Non-compliance with certain aspects of the Code may also lead the individual offender and Logicom to civil and/ or criminal liability. Any employee or representative of Logicom who violates the Code will be subject to appropriate disciplinary measures, which may include dismissal.

The Code provides information about our standards of integrity that we must follow in fulfilling our legal and ethical responsibilities. It is intended to provide guidance on our responsibilities and to assist in making the correct business decisions. It is each person's responsibility to understand the compliance programs that apply to his or her area of responsibility and to manage the business accordingly. Following the Code of Conduct and acting in full compliance with laws is not just about doing the right thing and protecting Logicom. It provides us with the means to expand our operations around the world and generate new business opportunities, differentiating us from the competition as our customers demand continuously higher standards, and strengthening our name and reputation.

Our company commitment to our core values and to ethical and legal conduct is very important, but the special commitment of every employee is equally important in order to make this commitment effective. We are all expected to follow the Logicom Code of Business Conduct.

## 2. A Message from the Managing Director

Dear Logicom Employees,

Logicom enjoys a highly esteemed reputation and considers doing business in an ethical and legal manner to be at the centre of its core values. We place emphasis on our ethical responsibilities and focus on following our related policies and applicable laws. We strictly adhere to our Code of Business Conduct in all countries we have presence.

The above concerns all of us, and all should be alert and report promptly any deviations. It is the responsibility of each one of us to ask questions and escalate any concern. We are always proud of the employees who speak up honestly and in good faith. The management of Logicom will immediately react in any case of misconduct and take immediate action to rectify any such situation.

Our Code of Business Conduct is an integral part of our company's culture and we stand by it with pride. This Code by itself with all supporting internal guidelines and policies supports your decisions and actions and provides confidence to make the right ethical and lawful decisions independently from the risk or complexity of the issue. The management of the company is always next to you to help you take the right decision. My office is always open to help you find answers and support your decision making.

Our success depends on all of us working together with passion to win, while at all times acting with morality, integrity, and respect. We can only win if we do things the right way.

At Logicom, we do things in our own unique and distinguished way, the Logicom Way. It is the Logicom way which delivers special value to our clients, partners and shareholders. Our core values include "Partnering in the Success of Our Clients, Uncompromising Integrity and Honesty, Commercial Agility and Efficiency, Respect of the individual to Succeed and Passion for Quality". The Logicom Way is embedded in our Code of Business Conduct, which establishes business ethics and uncompromising standards for high performance.

We are very proud that Logicom is recognized for its commitment to ethical behaviour, compliance and corporate social responsibility. To continue to be a leader in this area, it is our common responsibility to maintain and follow our Code of Business Conduct and have the power to operate in this competitive environment always as an ethical company.

The Logicom Way requires high standards from all of us, in whatever we do. I expect that all of you will continue to follow our Code of Business Conduct and stand for our core values, which make Logicom the unique company it is today.

*Varnavas Trinarchos*  
*Managing Director*



## 3. Our Core Values

Our core values are the underlying foundation of providing excellent service to our clients, which allows us to sustain our leadership and growth.

Our Mission is powered by the core values of Logicom:

- 1. Partnering in the Success of Our Clients**
- 2. Uncompromising Integrity and Honesty**
- 3. Commercial Agility and Efficiency**
- 4. Respect for the individual**
- 5. Passion for Quality**

### 3.1 Partnership in the success of our clients

*Enabling clients to succeed in their objectives by providing them with value-add solutions that create for them a competitive advantage*

- We focus in providing solutions that provide competitive advantage for our clients and our clients' customers
- We create value through the provision of innovative products and solutions
- We build long term relationships with our clients by enabling them to achieve their business and personal goals through our solutions and services
- We commit what we can reasonably deliver to our clients and deliver all our commitments
- We always act with a sense of urgency in responding to our clients' needs
- We listen to our client needs, provide solutions and deliver them with responsibility and care
- We provide solutions to clients by leveraging our capabilities and through delivery excellence
- We abide by our vendors' and clients' own Code of Ethics
- We comply with all government procurement and contracting laws and regulations
- We deliver with Quality to ensure customer satisfaction and profitability
- We always act in a teaming approach and providing a single LOGICOM team approach and view in front of the client, putting the clients and Logicom interests above any individual, team, department or function interests

### 3.2 Uncompromising Integrity and Honesty

*We take responsibility for our actions by acting in an ethical manner with integrity and honesty*

- We build trusted relationships that are based on consistent personal ethical conduct
- We are fierce in pursuing our business but always in an ethical and legal manner through fair competition
- We provide an environment which everyone can raise a concern without the fear of being retaliated
- We protect the proprietary information and intellectual of our clients and others
- We do not seek or use competitor's confidential information
- We avoid conflicts of interest, even perceived ones
- We ensure that our actions do not compromise Logicom's reputation
- We do not give or accept any inappropriate gifts or entertainment
- We do not provide or take any bribes or inappropriate payments
- We comply and cooperate in all audits and investigations

### 3.3 Commercial Agility and Efficiency

*Being agile, innovative, and reacting fast in changing conditions in order to achieve our goals. Provide an efficient operating environment in order to serve our clients*

- We maintain and enhance our leadership by being assertive but at the same time flexible and quick to reach
- We create and update a clear strategy understood by all internal stakeholders
- We have an overarching commitment to meet our annual budget and create strategies to execute successfully
- We leverage our global relationships in order to provide maximum efficiency and value to our clients
- We work for all qualified opportunities with the highest sense of urgency
- We work with our vendors in a synergistic manner taking into consideration their strategy updates
- We aim to continuously improve our strategic vendor partnerships
- We foster the value-add creation concept in all aspects the interaction with our clients
- We leverage on the capabilities and competencies we have in all Logicom teams aiming to create new innovative offerings and more efficient ways of working
- We take quick decisions in order to win in the marketplace
- We are quick to react in changing conditions
- Logicom is a good corporate citizen and undertakes several Corporate Social Responsibility (CSRs) initiatives

### 3.4 Respect for the Individual

*Creating a diverse and open environment and treating each individual according to our company's values*

- We share a passion and commitment to achieve the company's goals and objectives
- We treat each other with respect
- The leaders talk in an open and respectful manner
- We create an inclusive open environment fostering communication and teamwork environment valuing each employee's input according to their position and duties
- We achieve our individual results through teamwork execution
- We continuously improve our skills in support of the company's strategy and execution
- We have a mutual commitment to each other's growth and work-life balance
- We set clear expectations from each other
- We demonstrate trust and accountability
- We are willing to help each other in meeting our company's objectives
- We value and listen diverse points of views in an open and constructive manner
- Logicom leadership supports the work of individuals in volunteering for community and social work

### 3.5 Passion for Quality

*Quality is our enabler to achieve customer satisfaction, profitability and market position*

- The Board and Executive Management of the Company fully supports and sponsors the Quality Management System and is committed to providing products and services as per customer requirements
- We follow the processes of our Quality Management System while at the same time abiding to the relevant national legislation and regulations wherever we have presence
- We define what is needed in order to achieve our objectives
- We define Key Performance Indicators (KPIs) for our business goals and always work to achieve them
- We keep things simple, remove unnecessary meetings and bureaucracy, minimize the number of approvers, and focus on what the process is trying to achieve
- We always ensure the understanding between stakeholders and provide the necessary supporting documentation.
- We leverage on the Team by spreading the work and letting the process owners to lead their individual processes
- We always look for opportunities to improve

## 4. Corporate Compliance

### 4.1 Corporate Governance

At Logicom, strong corporate governance is the foundation of our long-term success. The Logicom Board of Directors sets high standards for the Group's employees, officers, and directors. We have implemented the Corporate Governance Code, as published by the Cyprus Stock Exchange, in March 2003, as part of our duty to serve as a prudent fiduciary for shareholders and to oversee the management of the Group's business.

Governance can only be as good as the Board of Directors behind it. At Logicom, each Board member brings a plethora of skills and experience to the table and we are fully engaged and committed to providing management and guidance to the Company's executive management team. We maximise shareholder value by taking a long-term view and are in constant pursuit of value creation. The Board is vigilant in its system of checks and balances and its assessment and management of risk.

The effectiveness of the Board is vital to the success of Logicom and the strategic direction that it provides, and we undertake a rigorous evaluation each year in measuring how well we are performing in relation to our shareholders, partners and employees.

Logicom currently has seven Board members, four of whom are independent. All members of the Board's Risk Management and Compensation committees are independent, and all but one member of the Board's Audit committee are independent. At each AGM, one third of the members of the Board in rotation have to step down and have to be voted for re-election. Shareholders also have the opportunity to approve the executive compensation of the Board at each year's AGM.

We take our responsibility to our shareholders very seriously. Our experience has shown us that diligent governance increases Logicom's competitiveness and enhances the company's performance, thus creating further value for our shareholders. This is why we continuously strive to improve the corporate governance of Logicom, maintain our focus on long-term strategy, and effectively monitor the Group's capital and liquidity position.

The message of the Managing Director, Mr Varnavas Irinarchos is:

***"Strong corporate governance is the foundation of our long-term success"***

### 4.2 Corporate Social Responsibility

Logicom is committed to making a positive impact on the community in which it operates. We believe we have a responsibility to our partners, employees, communities and stakeholders to exhibit responsible behaviour in all that we do, and create a sustainable environment in which we live and work.

#### **Giving Back to the Community**

Over the years, our employees have volunteered and been involved in a number of activities that help the community. These have included government-funded initiatives to provide internet access to rural communities in Cyprus; an island-wide one-day clean-up campaign to promote a cleaner environment; food collection for a local charity that helps families in need, and organization of blood drives amongst other initiatives.

**Employee Culture**

We organize a number of events each year in an effort to foster a productive and positive corporate culture. We offer frequent training courses for management, technical and other professional skills in order to help employees expand their ideas and develop their career and future within Logicom. We also encourage collaboration between our work teams through fun team building activities in and out of the office

Together we aim to succeed in contributing to the community not only in technological advancements but also by fundamentally raising awareness of environmental issues.

Should you wish to address any environmental issues, please contact the IMS Manager using the details: +357 22 551000 / environment@logicom.net

**4.3 Logicom and the Environment**

**Protecting the Environment**



Logicom is committed to protecting the environment and the well-being of the community in which it operates. For this reason, Logicom has developed and maintains an Environmental Management System conforming to the requirements of ISO14001:2004 which focuses on reducing the adverse environmental impacts of its operations by choosing products which are environmentally friendly, delivering products through well-planned routing of vehicles, and proper handling of waste materials.

This Environmental Management System provides the framework for:

- Monitoring and continuously improving the environmental performance

- of the company,
- Monitoring, addressing and conforming to relevant environmental legislation and any other stakeholder and market requirements,
- Setting and reviewing environmental objectives and targets and implementing them through environmental implementation programmes, reducing adverse environmental impacts, pollution and waste disposal from the company’s operation and by-products.

**Managing Electrical and Electronic Waste**

Logicom participates in WEEE Electrocyclusis’ collective schemes for the management of electrical and electronic waste. The purpose of this system is to collect this waste for recycling and reuse. In order to comply with our environmental policy, this waste should not be disposed of as common municipal solid waste, but should be segregated and disposed of in dedicated collection points and bins. Logicom encourages its employees and partners to ensure the proper handling and disposal of this waste in order to reduce our burden to the environment.



**Managing Packaging Waste**

Logicom participates in Green Dot’s collective scheme for the management of packaging waste. Therefore, paper and packaging waste is collected and forwarded to relevant, approved organizations for proper handling and recycling. All employees are aware of the measures taken within our organization for the proper disposition of paper and packaging waste. Additionally, we consistently implement the efficient use of paper in all our offices in order to minimise waste.



**Managing Battery Waste**



Logicom participates in the AFIS collective scheme for the proper management of battery waste. Battery waste is collected and forwarded to relevant, approved organizations for proper handling and/or recycling. Our aim is to reduce the number of batteries being disposed as municipal solid waste. We have also installed special battery recycle bins in all our offices and encourage our employees to also bring their own personal scrap batteries for recycling. Our partners are informed and encouraged to participate in this country-wide collective scheme for the proper handling of battery waste.

*We are an economic, intellectual, and social asset in every country and community where we do business*

**We are stewards of the environment**

- Reduce use of energy, water, and other resources where feasible
- Design and manufacture our products to increase efficiency, reuse, and recycling
- Support waste reduction and recycling efforts at Logicom and in our communities

## 5. Our Way of Working

### 5.1 Obeying Applicable Laws

*Obeying applicable laws is essential. It is the foundation upon which our operating principles are based. We have responsibility to comply with all laws that apply to our business.*

Logicom is conducting business in several countries. Our employees are citizens of those countries. We have responsibility to comply with the laws of the countries we perform business. At the same time, we need to comply with laws that are beyond the borders of the countries we operate. For example, we need to comply with specific US laws that deal with imports and exports of goods and services, anti-bribery, anti-money laundering etc. All Logicom employees have the responsibility to follow all applicable laws that relate to our business. The same applies for dealing with third parties. We have responsibility to follow all applicable laws before making any transaction with a third party.

If there is any doubt at any time for anything relating to complying with related laws for the Logicom business or for dealing with any third party, you have the responsibility to immediately seek support from your manager or the Legal department.

### 5.2 We conduct our business with integrity

*We conduct our business with integrity and care. We are firm to win in the marketplace, in an ethical manner. We comply with all laws relating to fair competition. We do not engage in bribing activities.*

#### **Anti-Bribery and Business Amenities and Gifts**

Logicom is firm in not providing or accepting bribes or corrupt payments regardless if this is customary in some countries. Never offer bribes or such payments either directly or indirectly through third parties e.g. business partners, vendors, or consultants.

Any such action, apart from being illegal, is not acceptable by Logicom as it can also damage our long-term reputation. We need to conduct all our business with integrity and in a legal manner.

In you interact with Public Sector officials, be particularly careful, as there are even stricter laws when dealing with such officials. Be particularly careful when providing expected-by the local culture normal business amenities e.g. lunch, dinner, small customary gifts, to ensure that such amenities are considered legal and are perceived as ethical.

#### **Fair Competition**

When dealing with competition we need to be firm but fair and in compliance with the related laws.

Competition laws help foster and preserve fair and honest competition in the market place. Laws are complex and sometimes unique in specific countries, so all Logicom employees need to take special care. Be very careful when dealing with cooperating with competitors as sometimes there are laws that deal with such cooperation if that limits competition in that market or result in monopolies.

Collecting competitive information about competition and using that is a normal business practice. However, such collection needs to be done in a legal and ethical manner and never using fraud and other means. This is particularly important to ensure compliance to the law and fair and honest competition.

#### **Intellectual Property and Confidential Information of Third Parties**

We need to use and protect confidential information and intellectual property entrusted by our clients in an appropriate manner and with care. If we happen to get access to confidential information or intellectual property that does not belong to Logicom we should not use it and we should seek advice by our manager or the Legal Department.

### **Trade Sanctions Compliance / US Export Administration Regulations**

Various countries impose sanctions on countries and persons. Such sanctions apply to the transactions that happen beyond the country that is imposing them. Such sanctions may impose specific restrictions to dealing with persons or solutions to even complete ban of dealings with specific countries.

As Logicom we have full responsibility to honour such sanctions especially when dealing with the sanctions imposed by the countries of our major vendors, suppliers or customers. In case of any doubt please consult your manager or the Legal Department immediately.

Compliance to the US Export Administration Regulations is mandatory for all Logicom employees which must be aware of the related regulations. All Logicom Employees are asked to sign-off every year that they understand and comply with the US Export Administration Regulations.

### **Keeping Accurate Financial Records**

Keeping accurate financial information is of paramount importance for Logicom as our management, shareholders, the stock exchange, and the authorities depend on this information.

We need to take particular care to ensure that the financial information we keep and the information we provide to management and the relevant authorities through filings (e.g tax filings) is accurate and correct. Such information provided must follow all Logicom policies and must be done in a timely manner where applicable.

### **5.3 We fulfil our business obligations with honesty and care**

*We perform our business engagements in an honest manner and with high care. We build long-terms trusted relationships with clients, we fully honour our commitments and we protect the information given to us*

### **Trust in Business Relationships**

Apart from fulfilling our contractual commitments we need to build a relationship of trust with our customers, partners and subcontractors. In doing that we need to

- Make commitments which we can honour. Never make commitments which we will for sure later not be in position to honour
- Handle changes in a responsible manner. In case that for any reason there was a change and we will not be able to honour our commitment, handle that change in a responsible manner
- Communicate with honesty about our products and services in all proposals, contracts, and business communications
- Respect the confidential information, intellectual property, and any personal data that is provided by our clients and associates or collected by us, take the necessary measures to protect it and use it only for the purposes that you have received it. There are laws and regulations that handle such information

### **Working with Public Sector Contracts**

Government contracting requires strict adherence to the local government procurement laws and regulations. Such commitments usually have much stricter rules of engagement.

All persons dealing with public sector contracts need to understand the specific rules of engagement and be particularly careful in dealing with such clients. Such requirements also apply to Logicom's subcontractors, vendors, and other partners working with Logicom in such contracts. These requirements apply to interactions with all Government-Owned Entities (GOE).

**Insider Trading**

Logicom strictly prohibits all employees from trading on material non-public information or sharing such information with others. This is illegal in most countries and Logicom does not accept such insider trading. Such information can be used by investors to trade on the stock exchange or can have an impact on the company's stock price. Such information sharing can have a significant impact on Logicom including fines.

**Conflicts of Interest**

We should avoid all cases of conflict of interest should they influence business decisions. Situations which can have a conflict of interest are:

- Using a business or personal relationship to influence a decision. This is particularly problematic in the case of public sector proposals and contracts.
- Participating in hiring or purchasing process of Logicom when dealing with 1st or 2nd degree relatives
- Identifying an opportunity while at your employment in Logicom and using it to have a personal gain
- Accepting gifts that might influence your decision making objectivity

If for any doubt you should contact your manager or the Legal Department for assistance

**5.4 We treat people with dignity and respect**

*Our strength for achieving our objectives comes from our diverse workforce and by providing a safe workplace for our employees to work.*

**Diversity**

Logicom is an equal opportunity employer. It has a no discrimination policy on the hiring or employees in terms of age, religion, sex or political beliefs. In fact Logicom's strength comes from its diverse employee based

**Illegal Drugs and Alcohol Consumption**

- Any employee working must be free of illegal drugs or alcohol
- The possession and usage of illegal drugs is strictly not allowed
- The consumption of alcohol during company-approved social functions is acceptable only in the countries and places that such consumption is allowed
- In all cases, the personal and religion beliefs by each person regarding consumption of alcohol must be fully respected. It is encouraged that no alcohol is consumed in the countries that alcohol consumption is not generally accepted

**Harassment, Violence, and Bullying**

Harassment, violence and bullying of any form are not allowed by any means in Logicom. The use of physical force, threatening or bullying someone with the intention to harm or even intimidate are strictly not tolerated. You should immediately report some activity if you have witnessed it towards yourself or other employees.

**Employee Data Privacy**

In the course of employment, Logicom might collect personal data about its employees. Such information needs to be handled with reasonable care and within the applicable laws.

## 6. Health & Safety

Logicom is very sensitive in the health, safety and welfare of its employees and customers, as far as is reasonably practicable. As such, Logicom aims to minimise the risk of accidents and does all it can to protect and sustain the health of all personnel.

The majority of our health and safety regulations initiatives and activities revolve around workplace practices and behaviour, and the use of machinery, tools and equipment.

Teams of managers, employees, health and safety specialists and other interested parties work together to establish best practice, share experiences and expertise and find ways of promoting health and safety matters throughout all levels of the company.

Our employees are our most valuable assets, and we will continue to do everything in our power to protect their health and safety.

Logicom’s Management Systems, implemented throughout the companies of the Logicom Group, assures faithful adherence to the above principles and compliance with all ISO 9001 and ISO 14001 requirements. These systems comply with the legislation in force and respect international conventions regarding environmental, social and health & safety issues. Logicom global operations, where management control exists, are committed to respect all elements and follow all principles stated within this policy.

Logicom is committed to continue improving the performance of its Management Systems through periodic reviews, audits and by setting and reviewing its objectives and targets, ensuring their relevance to the organizations’ activities and conforming to the company policies.

The relevant Integrated Safety Policy and the relevant documentation which apply are depicted in the following Figure.



Logicom has appointed a Health and Safety Coordinator presiding the Health and Safety Committee which co-ordinates and manages all Health and Safety issues.

For the improvement of the occupational conditions, Logicom caters for the following:

- ◆ Constantly updates the employees.
- ◆ Takes care that the employees comply with the health and safety instructions of the Committee.
- ◆ Instructs the employees regarding any risk that may occur during their duties.
- ◆ Participates in the training process.

The training of the employees is adapted to the evolution of risks and updated in case new risks may occur due to the technological evolution, to environmental situations, etc. and, therefore, such training is repeated periodically.

The employees are prevented from using dangerous equipment or material and there are provided specific instructions for the use of any non-regularly used equipment.

As top priority there is effort for risk minimization and in the second place, there are procedures that the employees (per risk group or per working unit) are instructed to follow, in accordance to the importance and to the possible consequences of a risk, clearly for preventive reasons.

The priority of action regarding Health and Safety Measures is set by the Health and Safety Committee.

Logicom is extremely careful and takes all necessary action in order to prevent accidents from the use of equipment and provides all necessary protective equipment to its employees when applicable.

More particularly, Logicom takes all appropriate measures so as:

- ◆ Employees do not eat or drink in activity areas where there is any possibility of risk. In the same areas smoking is forbidden.
- ◆ Employees, always dependant on the situation and the activities, are provided and obliged by the company to use appropriate protective or other special equipment and foresees for separate spaces to store the regular clothing from special equipment.
- ◆ Employees are provided with appropriate hygiene spaces.
- ◆ The protective equipment, is properly placed in specific space, checked prior to any use and replaced or repaired when damaged.
- ◆ Logicom maintains the equipment so that the health and safety of employees is not in danger.
- ◆ Employees are updated regarding possible risks in relation to their activities.

The employees of Logicom have been instructed of their following obligations:

***“Each employee is obliged to comply with the regulations of health and safety and to make sure that none of his/her acts or omissions endanger the health and safety of other persons”.***

A separate document with Health and Safety procedures and guidelines is provided to each Logicom employee during the specific training.

## 7. Our Employees Responsibilities

Logicom is expecting each employee to always act in an ethical manner and within the boundaries of the law, the Code of Business Conduct, and all Logicom processes and instructions. The violation of the Code of Business Conduct can seriously damage Logicom's interests. Any violation of the Code of Business Conduct is considered to be a serious violation, and may result in disciplinary action including termination of employment and legal liability.

- The employee is responsible to speak up if he/she has witnessed or has any experiences or concern about any unethical or illegal conduct. As such conducts can be damaging to Logicom, each employee is encouraged to bring up such actions to the attention of their Manager or the Legal Department
- Retaliation to any employee reporting such a concern is not acceptable by any means by Logicom management
- The cooperation of the employee raising a concern with subsequent investigations for any ethical or legal concern raised is required in order to aid Logicom in the investigation of the incident reported
- If you are approached with an ethical or legal concern, you need to take the report seriously and allocate the time and priority to listen. You can consult your manager or Legal department for guidance so as to properly handle it. It is wrong to receive such a concern and do not take any action
- In dealing with business partners, vendors, or suppliers, you can communicate our Code of Business Conduct and our standards in terms of quality, pricing, health, safety and compliance and if appropriate ask for their compliance to these standards. Report to your manager or legal department any concern about any partner, vendor or supplier so that you get support/guidance
- When communicating with investors, analysts or media, communicate in an honest manner. Note that all communications with investors, analysts, and/or media must be first approved by Logicom Executive Management. Only authorized persons by Logicom Executive Management can speak with these entities. In case of speaking on social media or forums, never give the impression that you are representing Logicom, unless you are specifically authorized to do so by Logicom Executive Management
- When exercising your political rights, take special care to ensure that your individual views are not presented or perceived as Logicom views. Remember that only Logicom Executive Management is responsible to manage any political contributions on behalf of Logicom including donations for products or solutions
- Every employee of Logicom is responsible to know the Code of Business Conduct as well as Logicom's regulations, and is responsible to act in compliance with these and in a legal manner.
- In case that you have doubt in which path to follow for resolution please reach for help from Logicom Executive Management or the Legal Department. Such decisions might have either benefits or negative impact for Logicom, so you have the responsibility to reach for help and guidance. There will be no tolerance for ethical violations
- Every employee has a personal responsibility to act ethically and comply with the law. The Responsibilities section of the Code of Business Conduct describes Logicom's expectations of you and what you can expect of Logicom.

For any question regarding your responsibilities and for any aspect of the Code of Business Conduct you need to consult your manager.

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# Logicom

Partners in your success

