

An aerial night view of a city skyline, featuring a prominent skyscraper (Burj Khalifa) and a complex highway interchange. The image is overlaid with a white network of lines and nodes, suggesting a global or interconnected theme.

# Anti-Bribery and Corruption Policy

Logicom

Logicom will uphold all related laws relevant to countering bribery and corruption in all the jurisdictions in which it operates. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for Logicom or under its control.

Our Anti Bribery Policy applies to all staff members working at all levels and grades, including the Board, directors, senior managers, officers, employees, consultants, contractors and trainees in all countries we have operations. Our staff receive regular training on our Anti Bribery and Corruption Policy, and are bound to conduct their tasks and responsibilities in accordance with the relevant requirements as part of their ongoing employment assessment process or contractual or other relationship with the Group. Any employee who breaches this Policy, whether or not such breach is intentional, may be subject to disciplinary action, which could result in dismissal for gross misconduct.

Third Parties we transact with are expected to have ethical standards that are compatible with this Policy and we reserve the right to terminate our contractual relationship with third parties if they breach this Policy and the right to initiate legal proceedings against staff or third parties for recovering any losses incurred as a result of such breach.

To maintain trust and integrity with our business associates and avoid any unethical or illegal conduct or a potential conflict of interest, we are prudent when accepting or giving gifts and hospitality. Logicom understands that the practice of giving business gifts and hospitality varies between countries and regions. What may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, proportionate and justifiable. The intention behind the gift or hospitality should always be considered.

Logicom does not make, and will not accept, facilitation payments or "kickbacks" of any kind. We only make charitable donations to bona fide charities that are ethical and legally constituted under local law and regulation. Logicom may provide sponsorship for normal marketing and corporate social responsibility purposes.

All our recruitments must be merit based, fair and in line with the stringent hiring standards applied for all employees.

All staff are encouraged to raise concerns in good faith and based on reasonable belief about attempted, suspected or actual bribery or any issue or suspicion of malpractice, at the earliest possible stage. Staff who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing should not be concerned about repercussions. Logicom encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken.

We are committed to ensuring that no one suffers any detrimental treatment or adverse consequences as a result of refusing to take part in bribery, corruption, improper payment activity, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future.

*For any observation or question regarding Logicom's Anti-Bribery and Corruption policy, please contact the Logicom Ethics Committee at [ethics@logicom.net](mailto:ethics@logicom.net) or by post at 26 Stasinou Avenue, 2003 Strovolos, P.O. Box 23472, 1683 Nicosia, Cyprus.*