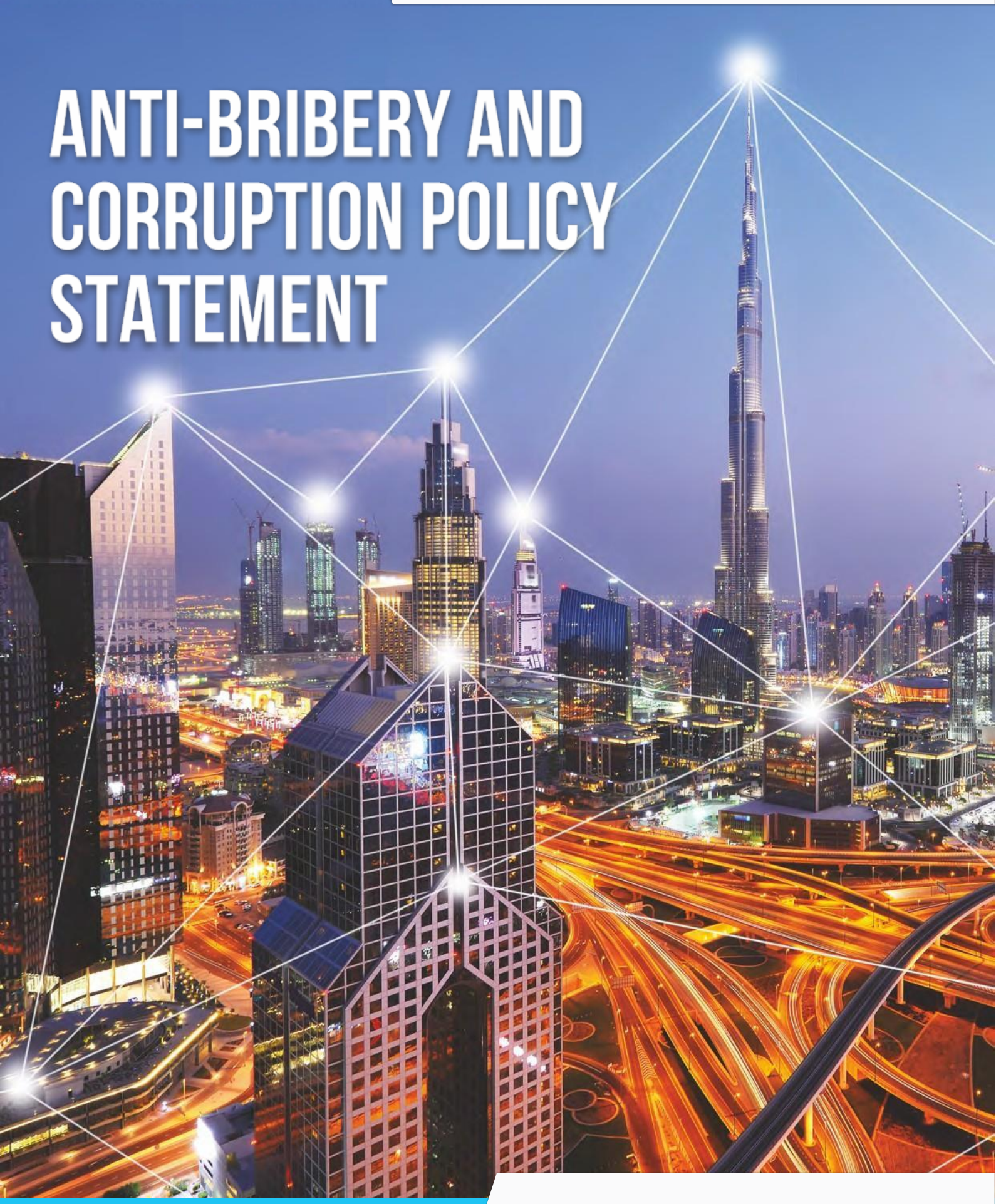
ANTI-BRIBERY AND CORRUPTION POLICY STATEMENT



Logicom

01 INTRODUCTION

Logicom conducts its business professionally, ethically and in compliance with the laws and all jurisdictions in which it operates and believes that integrity, fair dealing and good business practices are essential assets of the Group and should be reflected through all of its activities. Logicom has developed and implements an Anti-Bribery Management System that fully complies with the requirements of the **ISO 37001:2025 Anti-Bribery Management System.**

Logicom has a zero-tolerance approach to bribery and corruption howsoever arising. Logicom expects its entire staff to be committed to the aforementioned principles in all their business activities and relationships globally, and implements and enforces effective systems to reduce/mitigate the risk of bribery and corruption. Bribery is prohibited when dealing with any person or entity, anywhere in the world, whether they are in the public, private or any other sector.

02 SCOPE

Our Anti-Bribery and Corruption Policy applies to all staff members employed at all levels and grades, including the Board members, directors, senior managers, officers, employees, consultants, contractors and trainees in all countries where we have operations. Our staff receives 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 and /or contractual and/or any other relationship with the Group.

Interested parties we transact with, are expected to have ethical standards that are compatible with this Policy and the relevant anti-bribery and corruption legislation and to have an appropriate anti-bribery and anti-corruption compliance programme in place. We reserve the right to terminate our contractual relationship with interested parties if they breach this Policy as well as the right to bring legal proceedings in respect of any loss or damage (including reputational damage) suffered as a result of such a breach.

03 GIFTS, HOSPITALITY, PROMOTIONAL AND OTHER BUSINESS EXPENDITURE

In order to prevent any suspicion of corruption or misuse of company assets and ensure that gifts, invitations and hospitality are only offered or accepted appropriately, the following Gifts and Hospitality Limits must be complied with:

- Maximum price of gifts given or received: USD100/EUR100 per person per year;
- Maximum value of hospitality offered or received: USD100/EUR100 per person per month;

The giving or receiving of cash or a cash equivalent (such as gift certificates or vouchers) is strictly prohibited.

In all cases gifts/hospitality given or received must be pre-approved through submission of the Gifts and Hospitality Reporting Form.



04 FACILITATION PAYMENTS AND KICKBACKS

Logicom does not make, and will not accept, facilitation of payments or "kickbacks" of any kind to its staff or to business associates including interested parties, customers, suppliers/subcontractors and their employees, etc. All staff, business associates, interested parties, customers, suppliers/subcontractors are expected to avoid any activity that might lead to, or suggest, that a facilitation payment or kickback may be made or accepted by Logicom, its management or any of its employees.

05 DONATIONS AND SPONSORSHIPS

Logicom makes 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.

06 RAISING CONCERNS

Logicom is committed to the highest standards of openness, transparency, integrity and accountability. The Company utilizes an array of tools to deter and to encourage and facilitate the reporting of any bribery and/or corruptions attempts. Accessible here www.logicom.net/our-commitment/anti-bribery-and-corruption/ is the Anonymous Bribery Report enabling an individual (whether Logicom staff member or any other interested party) to report a suspected person or incident anonymously and provide sufficiently specific information and supporting evidence so as to enable further investigation. Logicom respects the choice for anonymity; however, whistleblowers are encouraged to identify themselves when making a disclosure, since it will allow the Company to more quickly and effectively investigate and act on their concerns. Undocumented statements may result in inability to investigate the reporting incident.



Additionally, a formal Disclosure **"Whistleblowing" Policy** has been established to ensure that staff, interested parties are able to speak up without fear of retaliation or any other adverse consequences. All members of Logicom's staff have a duty to speak out against and report suspected acts of bribery and corrupt practices and a failure or avoidance to report is not acceptable and may result in disciplinary action being taken. Logicom is committed to this Policy and to all related applicable laws and regulations. All disclosures are treated privately, consistently, fairly and in a professional manner in accordance with all Data Protection Laws.

07 CONCLUSION

Logicom will uphold all relevant laws and regulations in countering and suppressing 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.

As mentioned above, all staff and interested parties are encouraged to raise concerns in good faith and based on sufficiently specific evidence about attempted, suspected or actual bribery or any issue or suspicion of malpractice, at the earliest possible stage. Staff who decline to accept a bribe or staff who decline to offer a bribe, or those who raise concerns or report other's wrongdoing should not be concerned about repercussions.

Logicom is committed to ensuring that integrity, fair dealing and ethical business practices are reflected through all of its business activities and relationships globally. For this reason, Logicom has a zero-tolerance approach to bribery and corruption, and expects its entire staff to be committed to upholding these principles.

