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SECTOR	: ENTERPRISE MANAGEMENT	0	1						
SECTION	: CORPORATE ORGANIZATION & GOVERNANCE	0	1	0	1				
TITLE	: GIFTS AND HOSPITALITY POLICY	0	1	0	1	1	1	1	1/7

1 REFERENCES

- *Code of Business Ethics*
- *Employee Handbook*
- *"Travel Policy" (010401)*
- *"Whistleblowing Policy" (010110)*

2 PURPOSE

The purpose of this policy is to establish guidelines for corporate gifts and hospitality offered by an INTRACOM TELECOM employee or company entity (e.g. Department) to third parties such as customers or other business partners. Also, it provides guidance as to what an employee or company entity may accept as a gift or offering from a third party and under what circumstances.

In the context of this policy, the gift or hospitality giver or recipient may be a company employee / manager / the top management, or a company entity and a third party respectively such as customer (current or potential), supplier / vendor / subcontractor (current or potential), prospective employee, public authority and any individual or organization the company does business with.

This policy sets rules to be observed and details the authorization process and the necessary documentation in relation to gifts and hospitality offered or received in the context defined above.

INTRACOM TELECOM employees on business travel should read this policy in conjunction with the "Travel Policy", document 010401.

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				05/12/22

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3 SCOPE

This policy is applicable to all employees and free-lancers at INTRACOM TELECOM, including top management and all managers of the company, (collectively "personnel" or "individuals"). INTRACOM TELECOM subsidiaries are expected to issue similar documents aligned with the principles of this policy.

4 DESCRIPTION

4.1 Ground Principles

Bona fide hospitality and promotional business expenditures is part of business. Company personnel may offer to customers and business partners genuine and reasonable hospitality and business gifts as a reflection of good relations. In the same spirit, personnel may accept from business partners hospitality and minimal promotional offerings commensurate with standard business practices.

Personnel are expected to take care in spending the company's funds.

When offering or accepting a gift or hospitality, due diligence must be exercised to avoid any action that may be considered illegal or unethical. INTRACOM TELECOM is committed to acting in a transparent and lawful manner and denounces any form of corruption or bribery. Offering, promising or receiving any item of value, directly or indirectly as a means of influencing the actions of an individual holding a corporate public or legal duty, in order to gain or retain a business or any other improper advantage is bribery.

In the countries where INTRACOM TELECOM operates, bribery, active or passive, is a criminal offense and may incur heavy fines and other sanctions up to imprisonment for individuals as well as commercial and reputational damage to the company.

Under Greek Law there are provisions in the Criminal Code regarding bribery in the public sector (articles 235 - 237B) and in the private sector (article 396).

This policy draws the line between acceptable business practices regarding gifts and hospitality and what is or may be perceived as bribery.

Furthermore, inappropriate gifts or hospitality offered may be considered as unethical or offensive. Personnel are encouraged to get to know the counterparty, be acquainted with local cultural etiquette and stick to

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generally acceptable ethics standards. Business partners' Codes of Ethics, where available, should be studied and respected.

In all cases the company's Code of Business Ethics and Employee Handbook must be observed.

If any individual has questions about or needs clarification of any aspect of this policy, they should check with their Line Management.

4.2 Criteria for Giving or Receiving Gifts and Hospitality

For a gift or offering to be acceptable to give or receive it must be proportionate i.e. may not be perceived as extravagant; it must be transparent i.e. may be readily disclosed and documented in the company records; it must be provided openly; it may not be perceived as a reward in return of a favour obtained or anticipated or as a benefit utilized to unfairly influence a business decision.

Personnel need also to consider the frequency and cumulative value of exchange with the same recipient. It is not acceptable to keep offering gifts and hospitality to the same recipient or receive gifts and hospitality from the same donor, even if such individual gift / hospitality is of low value.

As a guidance:

4.2.1 Acceptable Gifts and Hospitality

- Food, refreshments and moderately priced meals and tickets to events (such as theatre, music, sport), which are attended by both business parties as part of a working session.
- Business gifts of modest value (indicatively: pens, mugs, calendars, tech gadgets) offered or received occasionally to build goodwill and strengthen business relations.
- T-shirts, pens, trade show bags offered or obtained at conferences, seminars, promotional / press events as well as food and beverages provided at the events.
- Items that can be displayed in company public areas (e.g. flowers).
- Confectioneries or other treats that are shared with several colleagues (e.g. as a Christmas present).

4.2.2 Not Acceptable Gifts and Hospitality

- Repeated or lavish gifts.
- Presents of personal garments (clothing, accessories), perfumes or jewellery.

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- Money or cash convertible gifts (vouchers, checks etc) regardless of the amounts involved.
- Anything that could affect or appear to affect the recipient's business judgment.
- Anything illegal

4.2.3 Gifts and Hospitality Requiring Special Consideration

- Travel costs and accommodation (e.g. air tickets, hotel vouchers etc.) offered or received.
- Hospitality and invitations to family members.
- Gifts or hospitality offered to public officials, local or foreign other than light meals and beverages provided at the company's premises in the frame of a presentation / company tour / business discussion. Particular care should be paid to assure that hospitality offered to public officials is in line with local anti-corruption laws and regulations.

4.3 Gifts and Hospitality Limit Values

Recommended threshold values apply per gift and hospitality category and type. Personnel are expected to exercise good judgement so that gifts and hospitality is reasonable and appropriate.

The recommended limit values cited below are per person and event / occasion.

Gifts: A gift offered or received should not exceed 50€. Multiple gifts to the same person on the same occasion are not allowed.

Promotional gifts may be ordered and dispensed by Marketing and Communications Department to Sales and Marketing managers and senior personnel to be offered as courtesies to customers and business partners.

Hospitality: The guideline for business meals offered when travelling abroad, is in general not to exceed 60€ per participant, taking also into account the local cost of living. In Greece, 40€ per participant is a reasonable value. Invitations to sport and recreational events should not exceed 80€ per participant.

4.4 Offering Gifts and Hospitality

As mentioned, gifts of modest value may be offered occasionally by company personnel to business partners following the guidelines set in this policy. Reasonable hospitality provided in the frame of a working session

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is by all means encouraged. Invitations to events, such as sport or recreational activities, and meals off-premises may be considered on a per case basis.

Personnel should talk to their Line Manager when in doubt as to whether a specific gift item, event, location or expenditure is appropriate. If uncertain, Line Management should discuss with the General Manager or the CEO, as appropriate according to the reporting line.

In general, it is recommended to consult with Marketing and Communications Department which will indicate the most suitable type of gift or hospitality.

4.4.1 Gifts and Hospitality Expenses

- Gifts and hospitality expenses should be budgeted.
- Personnel are expected to exercise care in expending the company's funds when offering gifts and hospitality.
- Whenever possible, gifts shall be purchased by Procurement according to the relevant procedure. Where not applicable, next bullet applies.
- Gifts and hospitality expenses is effected by using the company's business credit card, if one is provided to the individual in charge, otherwise by cash, or paid directly by the company (e.g. air-tickets, hotel vouchers).

4.4.2 Prior Notification

Whenever practically possible, personnel will inform their Line Manager and obtain permission, on each occasion, before offering a gift or hospitality. In general:

- Gifts and hospitality are authorised by the Department Manager / Director as applicable.
- For gifts or hospitality requiring special consideration (4.2.3) or exceeding 100€ in total, the superior in hierarchy of the Department Manager / Director, namely the General Manager or the CEO, as applicable, should also concur.

4.4.3 Approval of Gifts and Hospitality Expenses

- The company will accept and reimburse gifts and hospitality expenses only when they are incurred in connection with business.

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- Gifts and hospitality expenses effected using a company business card or cash must be documented by personnel offering such gift / hospitality on a Gifts & Hospitality Expenses form (Annex 1). Each gift or hospitality expense will be documented and accompanied with an official receipt / invoice (as applicable according to instructions provided by Accounting).
- The Gifts & Hospitality Expenses form shall be approved by the Department Manager / Director, as applicable.
- Gifts and hospitality expenditures requiring special consideration (4.2.3) or exceeding 100€ in total, will be subject to the approval of the pertinent General Manager or the CEO , as applicable according to the reporting line.
- GM expenses exceeding 500€ will be subject to approval by the CEO.
- After approval, the Gifts and Hospitality Expenses form with supporting documents (receipts, vouchers etc.) will be forwarded without delay to Accounting Department for recording into the books.
- Reimbursement of expenses will be made by the Accounting Department.

4.5 Receiving Gifts and Hospitality

- Personnel, Departments or the company shall not accept gifts or hospitality from business partners except as detailed in sections 4.1 and 4.2 of this policy.
- When offered a gift prohibited by this policy, the personnel involved must inform the gift giver of this policy and politely decline. If this is not feasible, the gift should be delivered to Marketing and Communication Department to be donated to charity.
- It is recommended that gifts of moderate quantities of food or wine, which may arrive during holidays when gift giving is customary, are shared among staff (e.g. at Christmas parties).

4.6 Records

The approved Gifts & Hospitality Expenses forms with relevant documentation are kept on file by Accounting Department. All Departments should keep records and monitor their respective gifts and hospitality expenses.

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4.7 Reporting Suspected Violations

Personnel who are aware of or suspect a non-compliant conduct of an individual or company entity or any third party the company does business with, should report the instance to their Line Manager, senior management or the Internal Audit Director, as instructed in the Code of Business Ethics. "Whistleblowing Policy", document 010110 is also relevant.

ANNEXES

1. Gifts & Hospitality Expenses form

CHANGE HISTORY

Edition	Date	Affected Paragraphs	Change Description
1	22/11/22	-	Initial Edition

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