



HUMAN RIGHTS POLICY

Logicom

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Definitions

Human Rights:

Human rights are the fundamental rights, freedoms and standards of treatment adhered to by governments, businesses, and individuals around the world and to which all people are entitled. Fundamental human rights are found in the United Nations Declaration on Human Rights, the eight ILO Core Labor Conventions, and various covenants and treaties that implement these principles.

European Convention on Human Rights (ECHR):

The European Convention on Human Rights (ECHR) (formally the Convention for the Protection of Human Rights and Fundamental Freedoms) is an international convention to protect human rights and political freedoms in Europe. Any person who feels their rights have been violated under the Convention by a state party can take a case to the Court.

United Nations Global Compact (UNGC):

The UN Global Compact is a strategic policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption. The Global Compact exists to assist the private sector in the management of increasingly complex risks and opportunities in the environmental, social and governance realms, seeking to embed markets and societies with universal principles and values for the benefit of all.

Universal Declaration of Human Rights (UDHR):

The Universal Declaration of Human Rights was enacted in 1948 by the United Nations, and contains 30 high-level principles that established the modern scope of “human rights.”

Freedom of expression:

Freedom of expression is a fundamental human right contained in the UDHR and several additional implementing treaties. As defined in the UDHR, freedom of expression is the right to express one's individual views and opinion, and the “freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.” UDHR, Article 19.

International Labor Organization (ILO):

The International Labor Organization is the international organization under the United Nations responsible for developing and overseeing international labor standards. It is the only United Nations agency that brings together representatives of governments, employers and workers to jointly shape policies / programs promoting decent work for all.

Global Network Initiative (GNI):

The Global Network Initiative is a multi-stakeholder organization committed to working with IT businesses to identify, navigate, and mitigate human rights risk and impacts.

UN Guiding Principles on Business and Human Rights:

These Guiding Principles are grounded in recognition of:

- (A) States' existing obligations to respect, protect and fulfil human rights and fundamental freedoms;
- (B) The role of business enterprises as specialized organs of society performing specialized functions, required to comply with all applicable laws and to respect human rights;
- (C) The need for rights and obligations to be matched to appropriate and effective remedies when breached.

POLICY STATEMENT AND SCOPE

Logicom's Human Rights policy formalizes our long-standing commitment to uphold and respect human rights for all people. This policy sets the grounds for Logicom to identify and address any existing misconduct or potential misconduct towards human rights. Logicom's management believes that respecting human rights is a fundamental part of Logicom's Group responsibility as a company and is vital to operate its business sustainably.

We expect employees, partners, suppliers, customers and governments to share this commitment to ensure that our business respects and promotes human rights. At the same time, we support the human rights of our stakeholders.

Logicom Group respects and upholds human rights as a fundamental value. We do this by ensuring that we do not violate the rights of others and try to address beforehand any potential adverse effects on human rights with which we are involved. We are fully committed in promoting human rights through our operations in different countries. We understand that the responsibility to respect human rights is a global standard of expected conduct for all business enterprises wherever they operate. It exists independently of government's abilities and/or willingness to fulfil their own human rights obligations, and does not diminish those obligations as they constitute an international set of laws, charters and policies.



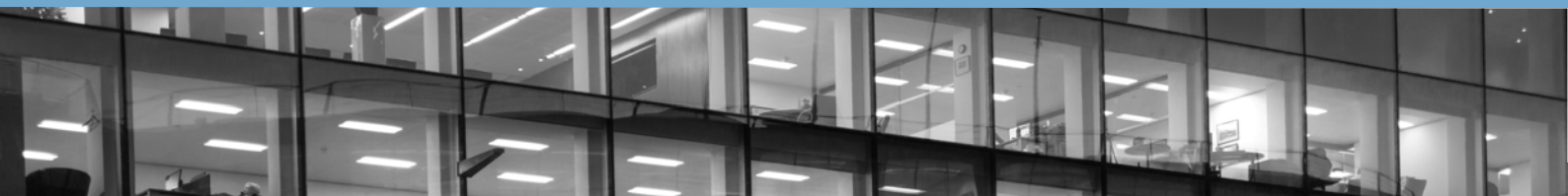
OUR POLICY AND THE HUMAN RIGHTS PRINCIPLES, DECLARATIONS, LAWS AND INTERNATIONAL CONVENTIONS

Logicom respects the human rights defined in the [United Nations Universal Declaration of Human Rights](#) (UDHR) & the European Convention on Human Rights (ECHR) the [eight Core Labor Conventions](#) developed by the International Labor Organization (ILO), the [UN Global Compact](#), and the [UN Guiding Principles on Business and Human Rights](#).

We respect the human rights of individuals belonging to specific groups or populations that command for particular attention, where they may have adverse human rights impacts on them such as indigenous people; women; national or ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers and their families.

OUR CORPORATE RESPONSIBILITY TO RESPECT HUMAN RIGHTS

Our commitment to respect Human Rights is reflected in our operational policies and procedures that are necessary to embed it throughout our Group. Our Code of Business Conduct includes in "Our Core Values" our statements for "Uncompromising Integrity and Honesty" and our "Respect for the individual"



Our Way of Working includes:

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 within the scope of our business activities.

We Conduct our Business with Integrity

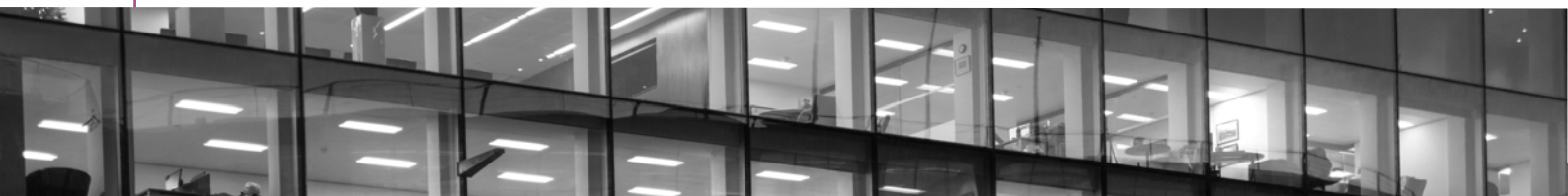
We conduct our business with integrity and care. We are firm to win in the marketplace, in an ethical manner, comply with all laws relating to fair competition and antitrust and do not engage in bribing and corruption activities.

We fulfil our business obligations with honesty and care

We perform our business engagements in an honest manner and with due care. We build long-term trusted relationships with clients, we fully honor our commitments and protect the information trusted to us.

We treat people with dignity and respect

Our strength for achieving our objectives derives from our diverse workforce and by providing a safe working environment free of bullying, harassment, victimization and unlawful discrimination and where individual characteristics and the contributions of all employees are recognized and valued.



Health & Safety

Logicom minimizes the risk of work accidents by proactively protecting the working environment but also encourages healthy habits for all staff.

Access to Technology

As a technology leading company, Logicom understands the large impact and many positive effects that this knowledge can bring to the society, and supports access to technology for everyone as a human right.

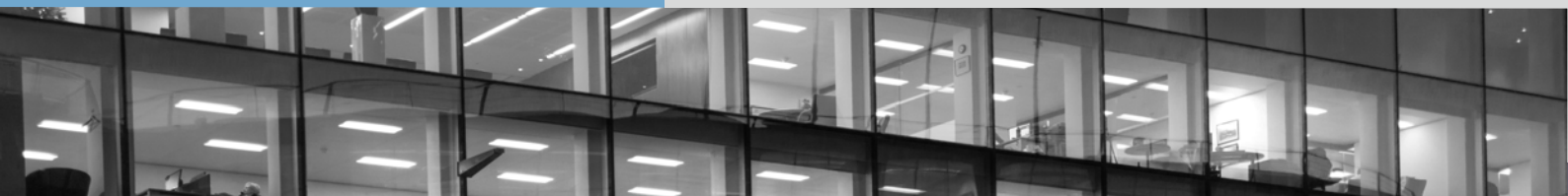
Personal Data Privacy

Logicom recognizes the importance of personal data privacy as a fundamental human right and implements Policies and Procedures for the protection of personal data.



Human rights is a matter which encompasses multiple issues and therefore this Policy is also supported by other policies and processes as follows:

- [Equality and Diversity Policy](#)
- [Disciplinary and Grievance Policies and Procedures](#)
- [Anti-Harassment Policy](#)
- [Data Privacy Policy](#)
- [Disclosure \(Whistleblowing\) Policy](#)
- [Anti-Bribery and Corruption Policy](#)
- [Group User Policy](#)
- [Group Security Policy](#)
- [Corporate Social Responsibility Report](#)
- [Ethics and Compliance Manual](#)
- [Environmental Policy](#)



OUR HUMAN RIGHTS DUE DILIGENCE

In order to identify, mitigate and prevent, any adverse human rights impacts, we carry out human rights due diligence exercises. The process includes assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.

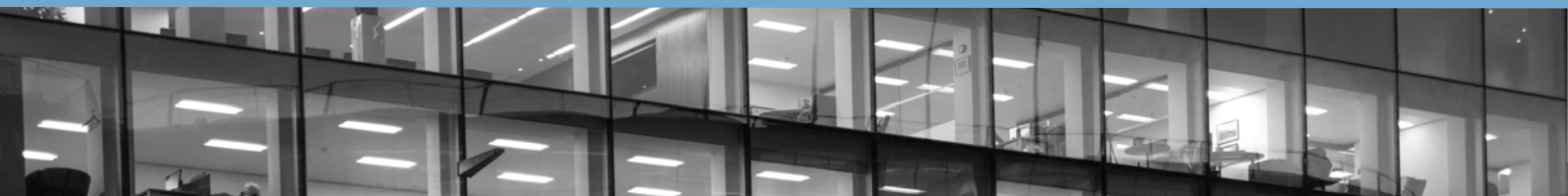
Our human rights due diligence exercise covers adverse human rights impacts that we may cause or contribute to through our own activities, or which may be directly linked to our operations, products or services by our business relationships.

In order to prevent and mitigate adverse human rights impacts, we integrate the findings from our impact assessments across relevant internal functions and processes, and take appropriate action.



In the event we identify adverse human rights impacts resulting from and/or caused by our business activities, we are committed to provide for or cooperate in, their fair and equitable remediation.

We recognize the importance of dialogue with our employees and external stakeholders who are or could be potentially affected by our actions. We are on alert for individuals or groups who may be at greater risk of negative human rights impacts due to their vulnerability or marginalization and recognize that women and men may face different risks. Logicom reinstates its commitment and respect towards human rights and reports any relevant actions reinforcing its Human Rights Policy on its annual CSR report. To verify whether adverse human rights impacts are being addressed, we track the effectiveness of our response based on appropriate indicators.



COMPLIANCE WITH THE POLICY

Compliance with this Policy is mandatory. Deviations or non-compliance with this Policy may result in disciplinary actions, up to and including termination, in accordance with the provisions of local laws.

Employees can communicate human rights' concerns that are governed by the aforementioned Policies, depending on the nature of the concern.

Human rights' concerns from suppliers, partners or any other stakeholder can be communicated to the Group Compliance Officer by email to groupcompliance@logicom.net.

If employees are unsure how to implement the Human Rights Policy in their day to day responsibilities, they must speak with their Departmental Manager and/or the Group Compliance Officer to ensure compliance with this Policy. If an employee observes or is aware of processes or actions that are not in compliance with this Policy, they must escalate the issue to the Group Compliance Officer.

No legal rights created.

This Policy is a statement of certain fundamental principles, policies and procedures that govern Logicom. It does not create any legal rights for any customer, supplier, competitor, shareholder or any other person or entity.

