

Consolidated Non-Financial Statement of the Group for 2021

We wish to announce that the Company's Board of Directors approved, at a meeting held yesterday, the Group's Consolidated Non-Financial Statement for 2021.

The full text of the Consolidated Non-Financial Statement for 2021 is attached to this announcement and is available, free of charge, from the Company's Registered Office (3 Zenonos Sozou Str., 3105, P.O.Box 51094, 3501 Limassol, Tel.: +357 25 818444, Fax: +357 25 372282, Email: log@adamides.com) and the Company's Administration Offices (26 Stasinou Str., Agia Paraskevi, 2003 Strovolos, Nicosia. P.O.Box: 23472, 1683 Nicosia. Tel.: +357 22 551000, Fax: +357 22 514294). It is also posted on the websites of the Company (www.logicom.net) and the Cyprus Stock Exchange (www.cse.com.cy).

Adaminco Secretarial Limited
Secretary of Logicom Public Limited

Attachment:

1. **Consolidated Non-Financial Statement 2021**

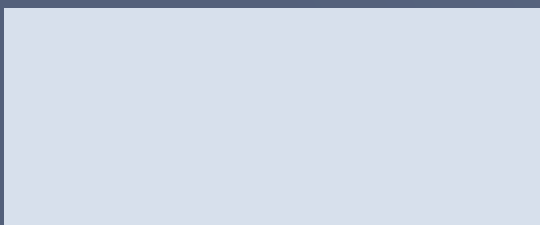
Non Regulated

Publication Date: 29/07/2022

Logicom



CSR REPORT
2021





REPORT PROFILE

Report Profile: This is the annual Corporate Social Responsibility (CSR) report of Logicom Public Limited (including its subsidiaries, hereafter referred to as “Logicom” or “Logicom Group”, or “Company”), issued for the calendar year 2021, which provides information in addition to Logicom's Annual Report. (The latest CSR report was issued for the calendar year 2020).

Logicom implements CSR practices in line with ISO 26000. This report's content and structure has been prepared in accordance with the GRI Standards: Core option.



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Message from the Managing Director

Dear Stakeholders,

Even though 2021 was another challenging year, we continued to accelerate our sustainability efforts during this time. The impact of the pandemic remains ever present, while the war in Ukraine in early 2022, has brought with it new challenges and uncertainties.

Facing these new challenges, we must not lose sight of the importance of remaining true to our commitment to continue building and operating a sustainable business while abiding by our core values. Our future is dependent on the actions we take today, and the actions we outline in this report demonstrate this commitment.

To succeed, we believe transparency and strong engagement with all stakeholders is vital. We set our goals and priorities every year based on feedback we receive from our stakeholders, with the intention to be better than we need to be.

Respect for Human Rights throughout our global operations, from supply chain to the customer, continues to be high on our agenda, as it is our fundamental responsibility as an organisation. Our long-lasting commitment to upholding and respecting human rights is formalised by Logicom's Human Rights Policy, which sets the grounds for Logicom to identify and address any existing or potential misconduct towards these rights. We recognise 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 due to their vulnerability or marginalisation and recognise that women and men may face different risks.

The health, safety, and well-being of our employees are of the utmost importance. This year has reminded us of the importance of technology as part of our everyday lives and its power to improve them. With the use of technology, we managed to shield and preserve our employees' health and wellbeing while maintaining the Group's operational ability.

We are continuing our journey towards a more diverse and inclusive workplace through education and collaboration between our employees, and we're committed to creating an inclusive culture that supports all employees, regardless of gender, gender identity or expression, race, ethnicity, religion, or ability.

As we look ahead, we see our commitments coming to fruition, but we know we cannot achieve our goals alone. I invite you to read our report, support our efforts and work together towards a common vision, one that aims to make this a better world for us and the future generations.

Varnavas Irinarchos,
Managing Director

ABOUT LOGICOM - GET TO KNOW US

Who we are

Established in 1987, Logicom Public Ltd is an international group of leading information technology companies, listed on the Main Market of the Cyprus Stock Exchange and a member of the FTSE/CySE20 and FTSE-Med indices. Logicom is also a member since 2014 of the Global Technology Distribution Council. The Company's headquarters are situated in Cyprus, at 26 Stasinou street Acropolis, 2003 Strovolos, Nicosia.

Logicom activities include:

- > The regional wholesale distribution of Technology Solutions and Services,
- > The provision of integrated Business Consulting Services, Business Software and IT Infrastructure Solutions, as well as, managed services
- > Investments holding

Logicom **Distribution**, as a leading regional Distributor of computer systems, networking products, components and peripherals, has developed excellent relationships with the world's leading technology vendors. These include Acronis, Adobe, AnyDesk, AMD, AOC, APC Aruba, ASRock, Autodesk, Bitdefender, Brother, Canon, Cisco, Citrix, Commvault, Corsair, Dell Technologies, FSP, Gigabyte, HP Inc., Hewlett Packard Enterprise, IBM, Intel, Instructure, InWin, Jabra, Kaspersky, Kingston, Lenovo, Lexar, LG, Linksys, Logitech, Microsoft, MSI, NetApp, Nokia, NZXT, Oracle, Palo Alto, Philips, Qnap, PNY, Realme, S3Plus Technologies, Sandisk, Seagate, Solarwinds, Silver Peak, Solidigm, Supermicro, Symantec, Sophos, Team Viewer, Trend Micro, Veeam, Veritas, VMware, and Western Digital.

Logicom counts on operational excellence and sound long-term relationships with the world's leading technology vendors to provide customers with the best-in-class products and services, when and where they are needed. Applying the highest standards of professionalism, Logicom is an indispensable link in the technology supply chain, facilitating mutually beneficial relationships with channel partners.

Logicom **Services** is a leading ICT services and solutions integrator in the region that supports organisations in addressing digital disruption and implementing a digital transformation agenda. This is achieved by offering its customers high-quality, value-adding advisory services to help them identify and unlock new sources of economic value, software solutions designed to meet their business objectives, and cutting-edge ICT infrastructures to support and run their business.

Logicom Services has local resources in Cyprus and Greece targeting the mid-to-high market in Southeastern Europe. Its strategic partnership with leading industry vendors and consulting firms ensures that it provides high quality solutions and services across all major business sectors, including Government, Semi-Government, Banking/Finance/Insurance, Telecommunications, ISPs, Media, Shipping, Hospitality and SMEs. These include Accenture, Cisco, Dell/EMC, Hewlett Packard Enterprise, IBM, Konica Minolta, Lenovo, Microsoft, and Oracle.

Logicom's **Investments** started in 2008, following partnerships with global leaders to successfully execute BOT (Build Operate and Transfer) desalination projects. Furthermore, Logicom is the largest shareholder of Demetra Holdings Plc, which holds more than 20% stake in Hellenic Bank Public Company Ltd, one of the main banks in Cyprus.

ABOUT LOGICOM - GET TO KNOW US

Our core values

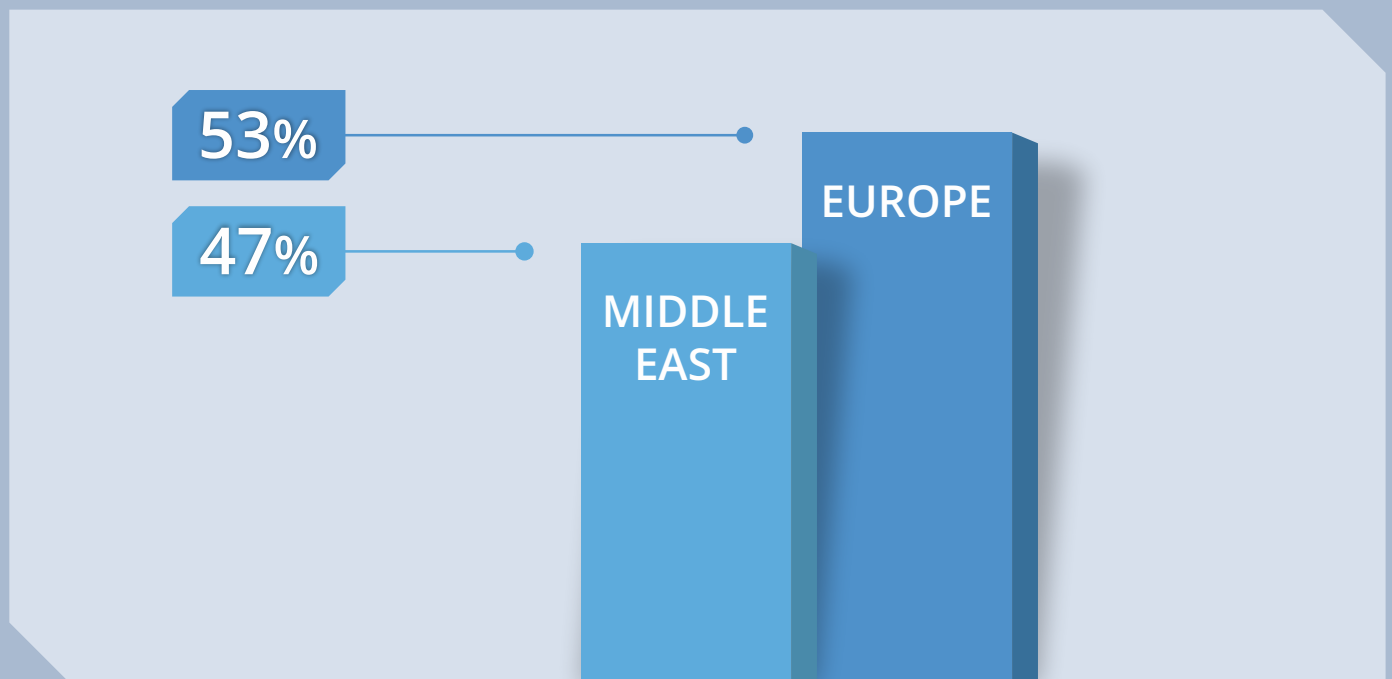
We deliver our mission every day guided by our core values:

- Uncompromising integrity and honesty
- Commercial agility and efficiency
- Respect for the individual
- The highest of service quality standards
- The continuous development of our people
- Partnering in the success of our customers

Logicom's commitment to its core values and ethical/legal conduct, as well as, the special commitment of every employee, is crucial to making this effective. The Code of Business Conduct is an integral part of Logicom's culture, which all employees are expected to follow.

Our people

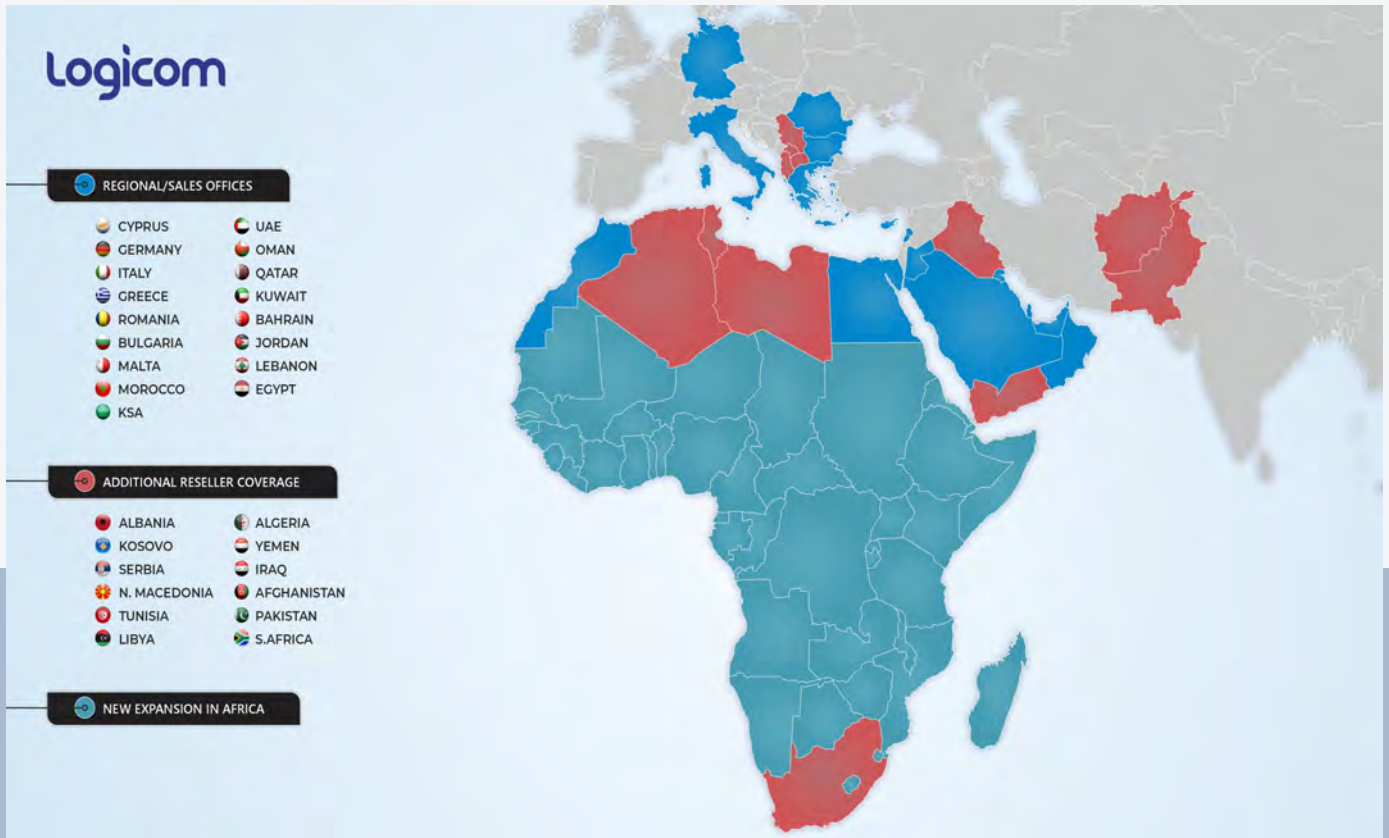
Logicom employs 813 professionals of 31 nationalities, situated in all the areas of operations.



▲Figure 1: Logicom Group employees by region (2021)

ABOUT LOGICOM - GET TO KNOW US

Our countries of operation



▲ **Figure 2:** Logicom Group countries of operation



Logicom operations span across multiple regions with a wide coverage, from Europe to the Middle East and Southeast Asia.

Logicom has physical presence in more than 16 countries and services more than 8,000 customers in 30 countries.

ABOUT LOGICOM - GET TO KNOW US

Key financials for 2021

The key financial metrics of Logicom including revenues, capitalisation, debt, equity, and assets can be found in the annual Report and Consolidated and Separate Financial Statements for the year ended 31 December 2021 located at <https://www.logicom.net/investors/financial-statements/>.

Significant changes in 2021

No significant changes arose during the reporting period in regard to Logicom's size, structure, ownership, nature of business, supply chain or any other information.

There were no restatements of information that were given in previous reports.



REPORT SNAPSHOT

Our Vision:

Logicom capitalises on the fervour and passion of its people in the constant pursuit of value creation for its customers. We aim to remain one step ahead, embracing the latest technology trends to meet the evolving needs of our customers.

Our Mission:

To provide high quality products and services in an efficient manner with exceptional customer service and support. We are guided by our core values: uncompromising integrity, essential commercial agility, maximum operational efficiency, the highest service quality standards, and the continuous development of our people.

We have committed to sharing the same passion in advancing our **CSR initiatives** across our Group operations as the passion we share for innovation and abiding by our core values. Thus, we recognise the need to incorporate broader **principles of sustainability** in our everyday business decisions.



EVALUATION OF PERFORMANCE



We have built our CSR Strategy based on the guidelines of ISO 26000 standard which provided us with a robust methodology to assess and embed sustainability across the organisation.

To set the strategy, our priority was to understand where we stand by **assessing our current performance through a Gap Analysis**.

Secondly, a **materiality assessment** was undertaken that aimed to assess the **material areas of focus** via stakeholder engagement based on which issues the internal and external **stakeholders** consider as relevant and significant to Logicom. Our stakeholders' views determine our priorities and are essential for developing a sound CSR Strategy.

Stakeholder engagement **happens** through events and **online surveys**. The material issues discussed in this report fall under the ISO core subjects of:



**Organisational
governance**



**Labour
practices**



**Human
rights**



**Fair operating
practices**



**Consumer
issues**

For each area, specific actions were identified and key performance indicators were set to help us improve our current performance and enable us to monitor our progress over time.

REPORT SNAPSHOT

CSR STRATEGY AND ROADMAP

Our progress 

against our targets 

at a glance:



ORGANISATIONAL GOVERNANCE

 WHAT WE SAID	 WHAT WE ACHIEVED UP TO 2021	 WHERE WE WANT TO GO
<ul style="list-style-type: none"> Finalise and share an Equality and Diversity Policy. 	<ul style="list-style-type: none"> ✓ Equality and Diversity Policy published. 	<ul style="list-style-type: none"> • Attract more diverse talent.
<ul style="list-style-type: none"> Upgrade existing Quality and Environmental Management systems. 	<ul style="list-style-type: none"> ✓ Successful completion of Quality and Environmental Management Systems upgrade for Cyprus based companies. ✓ Implementation of environmental KPIs for all Group companies. 	<ul style="list-style-type: none"> • Inclusion of Logicom-wide objectives to address environmental and societal risks identified. • Application of reduction and rectification measures to minimise the Group's effect on the environment.
<ul style="list-style-type: none"> Finalize and implement Logicom's Anti-Bribery management system. 	<ul style="list-style-type: none"> ✓ Parent company's Anti-Bribery management system finalised, implemented and achieved certification against ISO37001:2016. Guidelines and principles communicated and applied across all Logicom subsidiaries. 	<ul style="list-style-type: none"> • Continuous monitoring and training to ensure application of the guidelines and principles of the Anti-Bribery management system across all Logicom subsidiaries.
<ul style="list-style-type: none"> Stakeholders mapping and engagement plan. 	<ul style="list-style-type: none"> ✓ Stakeholders mapped. Engagement and communication plan set. ✓ Stakeholder engagement event was held in 2019. No subsequent events were held due to the pandemic restrictions ✓ Stakeholder engagement achieved annually through online surveys. 	<ul style="list-style-type: none"> • Prepare an agenda for a series of actions to further engage stakeholders.
<ul style="list-style-type: none"> Assign a dedicated CSR budget. CSR trainings to all employees. 	<ul style="list-style-type: none"> ✓ CSR budget assigned at Group level on an annual basis to cover CSR activities. ✓ CSR e-learning attended by all employees ✓ Assignment of CSR teams in different locations to further transmit the CSR philosophy and initiate actions & activities. 	<ul style="list-style-type: none"> • Continuous training and development of all employees on Group's CSR strategy to succeed in the achievement of its goals.
<ul style="list-style-type: none"> Implementation of Ethics and Compliance manual. 	<ul style="list-style-type: none"> ✓ Ethics and Compliance manual completed and communicated. 	<ul style="list-style-type: none"> • Follow up the adherence to its policies and obligations on a regular basis.

REPORT SNAPSHOT

CSR STRATEGY AND ROADMAP

Our progress 

against our targets 

at a glance:



LABOUR PRACTICES

 WHAT WE SAID	 WHAT WE ACHIEVED UP TO 2021	 WHERE WE WANT TO GO
<ul style="list-style-type: none"> • Complete and circulate a Disciplinary and Grievance Policy and Procedures. 	<ul style="list-style-type: none"> ✓ Grievance procedures and mechanism completed and communicated. 	<ul style="list-style-type: none"> • Continuous monitoring of the mechanism function and resolving grievances recorded.
<ul style="list-style-type: none"> • Training of employees on Anti-Bribery and Corruption principles. 	<ul style="list-style-type: none"> ✓ Anti-Bribery and Corruption trainings for all Logicom employees. 	<ul style="list-style-type: none"> • Continuous monitoring of the adherence to procedures to ensure there are no deviations from the Group's policies.
<ul style="list-style-type: none"> • Complete and share Disclosure (Whistle-blowing) Policy. 	<ul style="list-style-type: none"> ✓ Policy completed, released and communicated. 	<ul style="list-style-type: none"> • Continuous monitoring of the mechanism function and acting on matters recorded.
<ul style="list-style-type: none"> • Training of employees on Code of Business Conduct, US Export Regulations and Competition Law Compliance Policy. 	<ul style="list-style-type: none"> ✓ E-learning undertaken by all employees on the Code of Business Conduct, US Export Administration Regulations, and Competition Law Compliance Policy. 	<ul style="list-style-type: none"> • Continuous training of employees on Code of Business Conduct, US Export Administration Regulations, and Competition Law Compliance Policy.
<ul style="list-style-type: none"> • Increase employee training hours. 	<ul style="list-style-type: none"> ✓ Employee training hours increased compared to base year by 11,29 hours per employee. 	<ul style="list-style-type: none"> • Increase training hours per employee with emphasis on developmental trainings.



REPORT SNAPSHOT

CSR STRATEGY AND ROADMAP

Our progress 

against our targets 

at a glance:

CONSUMER ISSUES

 WHAT WE SAID	 WHAT WE ACHIEVED UP TO 2021	 WHERE WE WANT TO GO
<ul style="list-style-type: none"> • Customer satisfaction surveys. 	<ul style="list-style-type: none"> ✓ Services and Distribution sector customer satisfaction surveys and results analysis. ✓ Design the customer satisfaction channel through an e-commerce platform 	<ul style="list-style-type: none"> • Continuous assessment of customer satisfaction to meet customers' expectations.
<ul style="list-style-type: none"> • Evolve existing customer communication system. 	<ul style="list-style-type: none"> ✓ Redesigned communication system as part of the new website. 	<ul style="list-style-type: none"> • Optimum customer communication channel and systematic analysis of data collection.
<ul style="list-style-type: none"> • Optimisation of energy use in all commercial and public facilities. 	<ul style="list-style-type: none"> ✓ Measurement of energy consumption in all countries of operations in progress. 	<ul style="list-style-type: none"> • Achieve energy optimisation in all of our warehouses and offices. Implementation of measures to manage properly our environmental impacts in all subsidiary companies.
<ul style="list-style-type: none"> • Promote sustainable consumption. 	<ul style="list-style-type: none"> ✓ Sustainability benefits part of solutions services offered. 	<ul style="list-style-type: none"> • Promote sustainable consumption through our customer channel.



REPORT SNAPSHOT

CSR STRATEGY AND ROADMAP

Our progress 

against our targets 

at a glance:

HUMAN RIGHTS

 WHAT WE SAID	 WHAT WE ACHIEVED UP TO 2021	 WHERE WE WANT TO GO
<ul style="list-style-type: none"> • Draft a unified Human Rights Policy. 	<ul style="list-style-type: none"> ✓ Unified Human Rights Policy was completed and released. 	<ul style="list-style-type: none"> • Train all employees on Policy and procedures and monitor its application.
<ul style="list-style-type: none"> • Perform due diligence examination on Human Rights impacts in the countries with significant operations. 	<ul style="list-style-type: none"> ✓ Examination of possible tools to assist in the designing of the procedure to be followed to perform due diligence. ✓ Initial assessment of two significant operations. 	<ul style="list-style-type: none"> • Ongoing due diligence procedures to cover all the countries of operation to identify, prevent, mitigate and account for how it addresses any adverse human rights impacts.

FAIR OPERATING PRACTICES

 WHAT WE SAID	 WHAT WE ACHIEVED UP TO 2021	 WHERE WE WANT TO GO
<ul style="list-style-type: none"> • Achieve communication of Anti-Bribery and Corruption Policy to all customers, vendors and business associates. 	<ul style="list-style-type: none"> ✓ The Anti-Bribery and Corruption Policy was communicated to customers and business associates. 	<ul style="list-style-type: none"> • Continuous monitoring of the adherence to the Policy and its procedures.
<ul style="list-style-type: none"> • Inclusion of social and environmental procurement criteria for suppliers and businesses associates. 	<ul style="list-style-type: none"> ✓ Assessment of social and environmental procurement criteria for suppliers and business associates in progress. 	<ul style="list-style-type: none"> • Establish procedures for the inclusion of social and environmental criteria as part of the procurement process.
<ul style="list-style-type: none"> • Assess the Group's performance on: responsible political involvement, promoting social responsibility in the value chain and respect for property rights. 	<ul style="list-style-type: none"> ✓ Assessment of the Group's performance in progress. 	<ul style="list-style-type: none"> • Define the Group's targets to minimise any possible risks that arise.

REPORT SNAPSHOT

CSR STRATEGY AND ROADMAP

Our progress  in numbers:
(*compared to base year)

- ✓ Increased the presence of female employees by **1%**
- ✓ Increased the presence of female employees in managerial positions by **4%**
- ✓ Increased the presence of employees below the age of 30 by **7%**
- ✓ Increased and maintained the presence of locals in senior management positions by **2%**
- ✓ Increased the ratio of new hires to resignations by **36%**
- ✓ Increased the number of female new hires by **8%**
- ✓ Increased the average training hours per employee by **155%**

Engaging with the community is important for promoting our Group’s values and building strong relationships in the areas of our operations. In that respect, further to the priorities set out in our CSR strategy, we have also taken up the following initiatives:

LOGICOM ACADEMIC MERIT SCHOLARSHIPS PROGRAMME

In 2021 Logicom continued to fund the studies of Cypriot students that applied through the Logicom Academic Merit Scholarship Programme for Postgraduate Master Level Scholarships and Postgraduate PhD level scholarships, in reputable accredited universities in Cyprus or abroad.

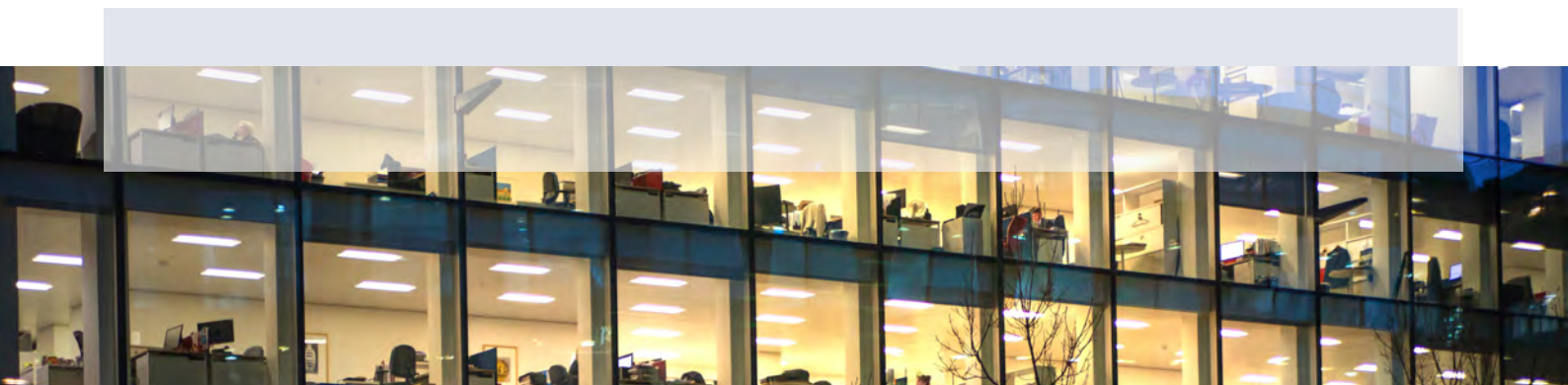
Through this initiative, Logicom aims to educate and empower future pioneers who want to specialise and expand their knowledge in the field of new and emerging technologies.

The areas of study include:

- > Cloud Computing
- > Artificial Intelligence
- > Big Data & Analytics
- > Cybersecurity
- > Internet of Things (IoT)
- > Machine Learning
- > Blockchain



At the 13th Cyprus CSR Conference 2021, the Logicom Academic Merit Scholarships programme was awarded by the Association of CSR Cyprus, as one of the best CSR practices, being recorded in the register of good CSR practices applied by organisations in the country.



REPORT SNAPSHOT

ENGAGING WITH THE COMMUNITY

LOGICOM CYPRUS MARATHON

Logicom has been the official sponsor of the Logicom Cyprus Marathon for 7 consecutive years, and it has signed on for another year as Title Sponsor of the Logicom Cyprus Marathon. With this partnership, Logicom lends its support to wellness, sportsmanship, and healthy living, while engaging with and giving back to the local community. This multi-cultural running festival takes place in Paphos every year, and, as a multi-cultural company, Logicom is proud to continue lending its name to this great event that is set to bring together people from across the world, working towards achieving their fitness goals. The Logicom Cyprus Marathon hosts thousands of runners each year, with Logicom participating with the largest team, made up of employees, partners and vendors both from Cyprus and abroad.

This partnership reflects Logicom's commitment to promoting health within the workplace and enables the Group to disseminate the message of the benefits of exercise, maintaining a healthy lifestyle, respecting competitors, following rules, and teamwork.

Due to the outbreak of the Coronavirus pandemic (COVID-19) the 23rd Logicom Cyprus Marathon was rescheduled to the 5th of December 2021, and it was successfully completed by more than 1600 participants. Logicom is proud to be awarded every year for registering the biggest team in the 5km Fun Run, which is comprised of its employees and partners.

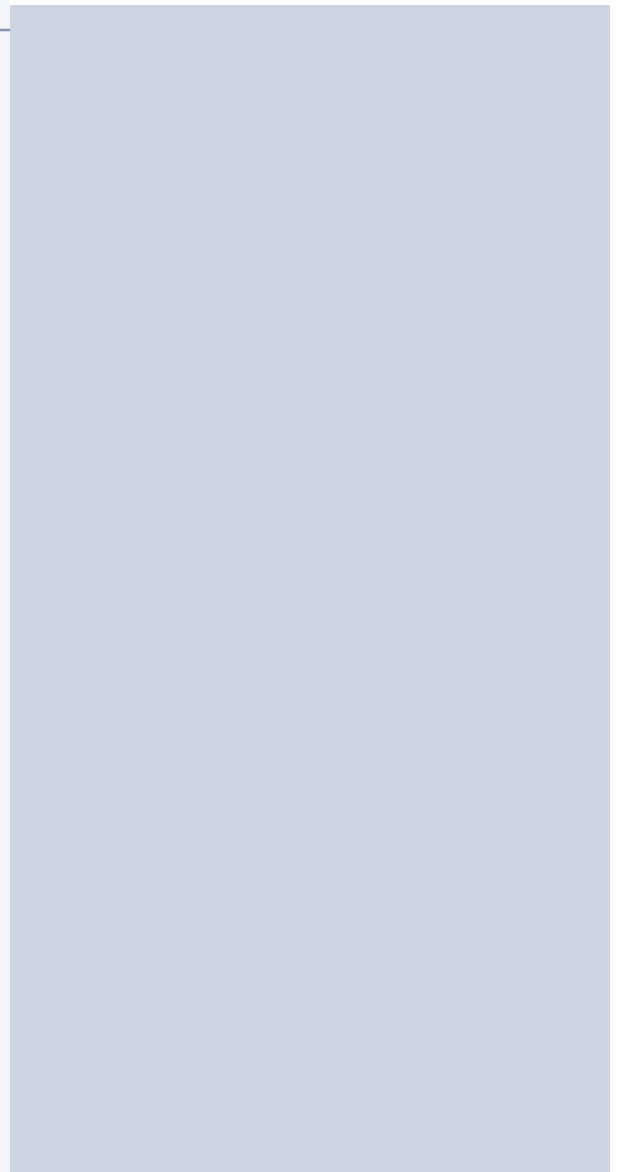


REPORT SNAPSHOT

ENGAGING WITH THE COMMUNITY

BREAST CANCER INITIATIVE

Logicom promotes Breast Cancer Awareness Month every October. In 2021, the company made a donation in honour of its employees who are affected directly or indirectly by the disease, renewing its commitment to support the fight against breast cancer.



SUPPORTING SCHOOLS AND UNIVERSITIES IN CYPRUS

Logicom offered cash contributions towards an award to the University of Cyprus' best performing graduate in the computer science department.

Taking into consideration the **schools'** need for IT equipment and funding for their respective teams to be able to participate in IT- related competitions, Logicom donated refurbished IT equipment and made cash contributions.

REPORT SNAPSHOT

ENGAGING WITH THE COMMUNITY

CHARITY FUTSAL CHAMPIONSHIP

Logicom in cooperation with ACER, organised a charity futsal championship with the purpose of awarding ACER's IT equipment to charitable institutions chosen by the winners. Logicom invited its customers in Cyprus to take part in the event with their teams and support the work of these institutions during the Christmas season.



Accompanied by Logicom's representatives the first and second- placed teams, visited the institutions, handing out the equipment to children in the care of the Pediatric Oncology unit at Makareio Hospital and patients of the Cyprus Anti-Cancer Society.

SUPPORT TO THE LOCAL COMMUNITIES IN CYPRUS

Responding to local community call for support, cash contributions were made to support various non-profit organisations such as: Europa Donna Cyprus (supporting women and men patients with breast cancer), Pancyprian Anti-Cancer Association (supporting patients with cancer), Alkyonides (supporting people in need), and International Humanitarian Aid (provision of medical services to Africa).

REPORT SNAPSHOT

ENGAGING WITH THE COMMUNITY

CELEBRATION OF WOMEN'S DAY IN CYPRUS, UAE, QATAR, OMAN & KUWAIT

Logicom companies across the Group made donations to local charitable institutions to support their work and gave out gifts to its women employees to celebrate International Women's Day.



SUPPORT TO UKRAINIAN REFUGEES

Logicom Romania could not remain indifferent to the tragedy of Ukrainian people as thousands of refugees were reaching its country's borders. Employees raised funds and, together with the company's contribution to their initiative, bought essentials and delivered them at the collection sites. Employees also volunteered to assist with the distribution of donated equipment and goods to Ukrainian families.



LOGICOM'S OPERATIONS: An Overview

CORPORATE STRATEGY



Our Vision

To be the leading technology company in our region by offering an excellent distribution platform and best in class Integrated IT Networking, Telecom, and Business Software solutions to our customers.



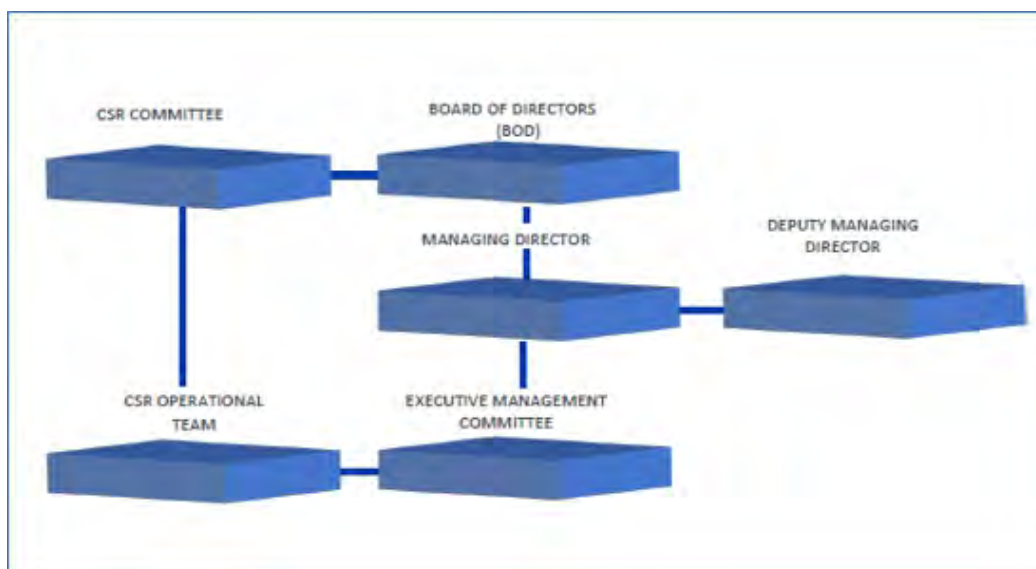
Our Mission

To provide high quality products and services in an efficient and effective manner while providing exceptional customer service and support.

SHAREHOLDER STRUCTURE

Logicom Public Ltd is a public company listed on the Main Market of the Cyprus Stock Exchange. Its shareholder structure can be found in the Annual Report and Consolidated and Separate Financial Statements- for the year ended 31 December 2021 which is located at <https://www.logicom.net/investors/financial-statements/> (Refer to note 40)

LOGICOM'S SUSTAINABILITY MANAGEMENT: Organisational Structure



▲ Figure 3: Logicom's sustainability management structure

LOGICOM'S OPERATIONS: An Overview

LOGICOM'S SUSTAINABILITY MANAGEMENT: Organisational Structure

The CSR Committee, appointed by the BoD consists of Directors and members of the Executive Management team and is mainly responsible for the formulation of CSR Strategy and the definition of primary CSR goals.

Under the direction of the Managing Director, the Executive Management Committee oversees Logicom's CSR programme. The CSR Operational Team handles the CSR programme execution.

The CSR Operational Team is comprised of employees from various departments broadly representing Logicom's business operations. It reports to the Executive Management Committee on progress, achievements, and any issues that may arise.

For any further details on the governance structure and composition of the organisation, including Committees of the highest governance body, refer to the Group's Annual Report and Consolidated and Separate Financial Statements for the year ended 31 December 2021, published on Logicom's website.

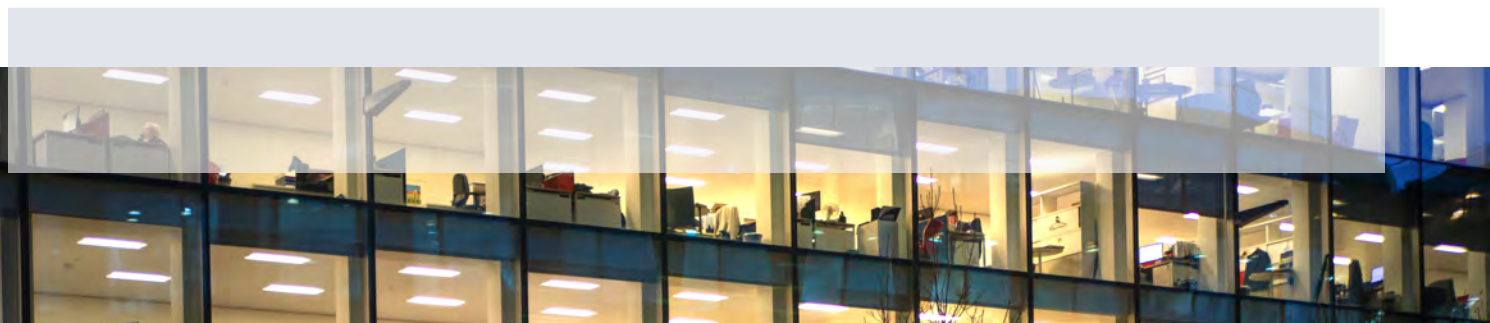
<https://www.logicom.net/investors/financial-statements/>

ETHICS AND INTEGRITY

Ethics and integrity are core values that are well embedded in Logicom's way of doing business. Logicom has a formal written Code of Business Conduct, which together with the Ethics and Compliance Manual, sets the standards of Business Conduct for all of its employees, suppliers, consultants, and third-party representatives in all the countries of operation. The Code sets the level and provides information on the ethical and integrity standards that must be followed in order to facilitate the fulfilment of business responsibilities and making the correct business decisions.

Logicom's commitment to its core values and to ethical and legal conduct is very important. The individual commitment of each and every employee is also immensely important in order to make this a reality. All our employees are committed to follow the Code of Business Conduct and disciplinary measures apply for code violations.

The Code of Business Conduct includes the standards and norms of behaviour that govern Logicom's way of conducting business. It is developed and fully supported by the Executive Management team, which maintains the responsibility for the Code of Business Conduct, and approved by the Board of Directors. Training on the Code of Business Conduct is given to all employees during their induction training, and annual trainings are conducted through an e-learning platform for all Group employees. It is also obligatory for all employees to acknowledge and sign the Code of Business Conduct principles every six months.



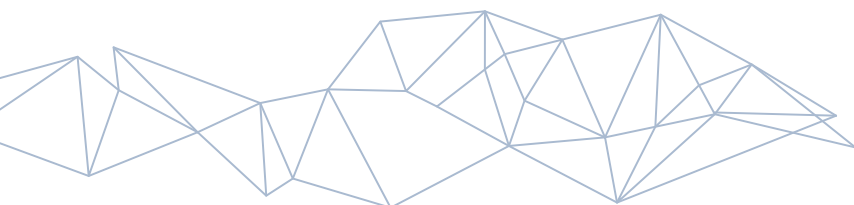
LOGICOM'S OPERATIONS: An Overview

ETHICS AND INTEGRITY

The Ethics and Compliance Manual focuses on our compliance culture and builds on our training and development, evolving our processes and continuously strengthening our compliance efforts to address the challenges and complexities of this fast moving and rapidly evolving business and regulatory environment. The Logicom Ethics and Compliance Manual includes summaries of our key policies and associate links to the full policies, key compliance areas, and ethical guidelines. The policies covered by the manual are: Equality and Diversity Policy, Disclosure (Whistle- Blowing) Policy, Disciplinary and Grievance Policy, Anti-Harassment Policy, Anti-Bribery and Corruption Policy, Business Associates Onboarding Policy, Group User Policy, Cyprus and Greece Quality Policy, Cyprus Environmental Policies, Data Privacy Policy, Employee Privacy Notice, Ethics and Compliance Manual, Staff Handbook, Leave Policy and Salary Confidentiality Policy.

The Code of Business Conduct and the Ethics and Compliance Manual are written in English which is the official language of communication throughout Logicom and are both published on the Logicom Group website.

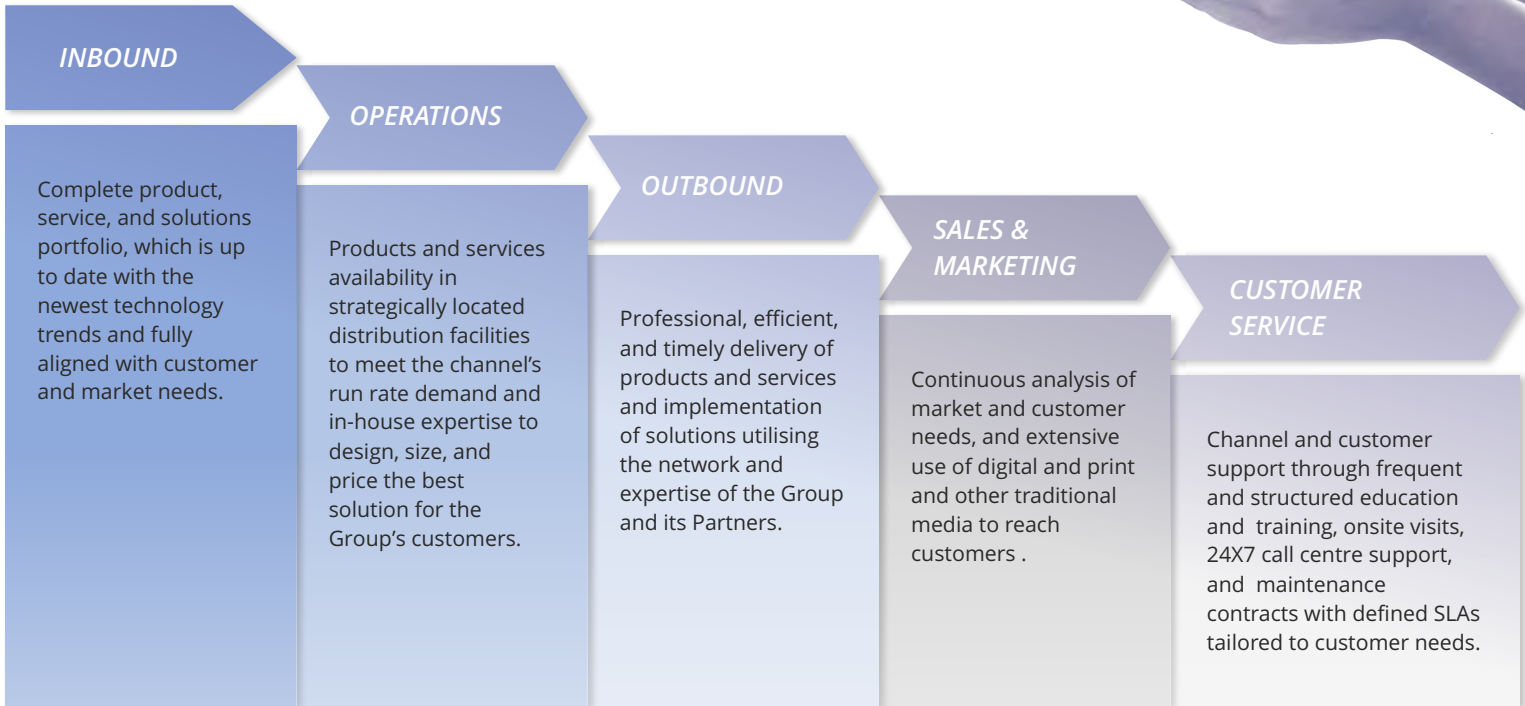
Logicom relies on its employees to act upon its values and ethical conduct in their interaction with business partners.



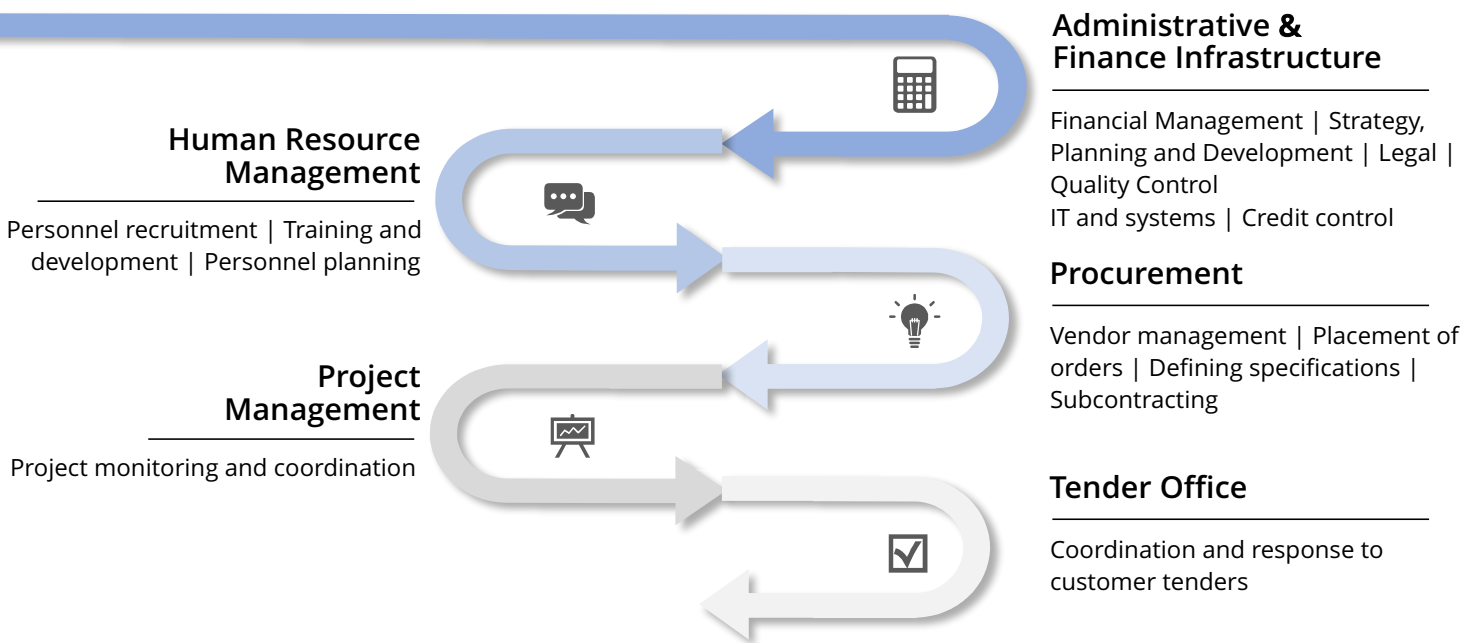
LOGICOM'S OPERATIONS: An Overview

VALUE CHAIN STRUCTURE

PRIMARY ACTIVITIES



SUPPORT ACTIVITIES



▲ Figure 4: Logicom Group's value chain structure (based on Porter's value chain model)

OVERVIEW OF LOGICOM'S OPERATION

SUPPLY CHAIN

Promoting sustainability through our supply chain is one of our primary concerns.

We believe that a careful selection of our suppliers guarantees that we add value to our customers' success. We distribute the products and services of more than 80 selected vendors. Logicom's suppliers are prominent companies renowned for their sustainability practices.

We ship to the markets where we operate more than 36,000 unique products through a well-established reseller network exceeding 6,500 customers. Our well-structured and experienced supply chain streamlines the sourcing of computer hardware, peripherals and consumables as well as networking, security and storage equipment from selected suppliers to the doorstep of our reseller partners. We also facilitate reverse logistics for warranty purposes.

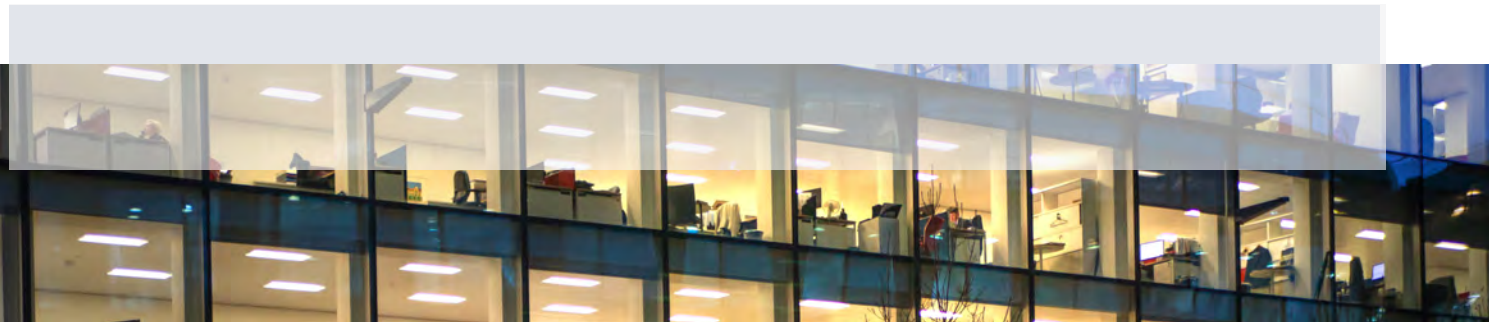


LOGICOM'S OPERATIONS: An Overview

SUPPLY CHAIN

VENDORS

A selected group of Logicom technology partners:



LOGICOM'S OPERATIONS: An Overview

LOGISTICS SERVICE PROVIDERS:

A group of local and foreign freight forwarders

INTERNALLY OPERATED WAREHOUSES:

Warehouses in all group locations

SUPPLY CHAIN FIGURES FOR 2021:



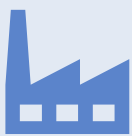
36.057

Item Codes



6.903

Customers



81

Suppliers



21%

of customer orders served through Logicom e-commerce, corresponding to **7.6%** of distribution revenue



+195.000

Shipment Counts



+850million

Purchases



9

internally run warehouses and 5 run by 3PL partners



1.5million

Seats on Logicom Cloud marketplace

EVALUATION OF LOGICOM'S PERFORMANCE

For the purposes of this CSR report, Logicom Group has adopted the guidelines of the ISO 26000 standard (which have been verified by an independent third-party) and is conforming its reporting to the GRI Standards. ISO 26000 identifies seven core subjects as integral for managing an organisation's impact in the context of corporate social responsibility. These seven core subjects are outlined in Figure 6. Each core subject covers a number of subsequent issues of interest (41) and key considerations (313).



Logicom is aware of the popularity of the term “ESG”, which refers to the Environmental, Social and Governance (ESG) criteria, and the ongoing discussion in the business world. To help distinguish between the different terms used in this report and in our industry more widely, if CSR is considered the framework to make an organisation responsible in several areas, then corporate sustainability is the ability of the organisations to respond to their short-term needs without compromising the ability to meet their future needs and ensure their long-term survival. In this sustainability realm, the ESG criteria make the efforts of an organisation pertaining to CSR and sustainability, both measurable and quantifiable. Logicom sets the framework of its sustainability strategy and identifies and assesses its impacts using ESG criteria, via this CSR report.

To determine the status of CSR at Logicom Group, a gap analysis was undertaken, followed by a materiality assessment to identify the areas of social responsibility focus. Both the gap analysis and the materiality assessment considered all seven core subjects of ISO 26000, including all the issues of interest and key considerations under each core subject. A sustainability management software solution was used to undertake the gap analysis and to produce the materiality matrix. The Group performs a gap analysis every three years that forms the basis of its CSR strategy. Accordingly, following the gap analysis that was performed in 2017, which was the base year, a revised gap analysis was performed in 2021.

EVALUATION OF LOGICOM'S PERFORMANCE

The aim of the **gap analysis** was to determine the current status of CSR at Logicom Group with reference to, and as defined by ISO 26000, in order to comply with the standard and relevant national and international legislation, including the EU Directive 2014/95/EU on non-financial and diversity information by certain large undertakings and groups (transposed into the Company Law Chapter 113 (N. 51 (I)/2017) in Cyprus. This report's scope also covers the requirements of the existing Non-Financial Reporting Directive (NFRD and the local transposition of this legislation in Cyprus' Companies Law (Chapter 113, Article 151A). Logicom understands that the NFRD will be replaced by the Corporate Social Responsibility Directive (CSRD, which will broaden its scope, simplify and bring sustainable reporting on par with financial reporting in order to standardise sustainability-related disclosures, introduce the concept of "double materiality", and introduce the requirement of third-party audit. Logicom will take every action possible to ensure its compliance with the CSRD once it becomes legally binding.

The aim of the materiality assessment was to identify Logicom's material (or most important issues) in order to be in a position to re-evaluate its current CSR strategy, considering the views of its internal and external stakeholders through their engagement.

Therefore, the following three core subjects are the action areas that Logicom will focus on when forming its CSR strategy and sustainability report for the following 12 months.

Action areas as defined by base year materiality assessment



Organisational governance



Labour practices



Consumer issues

Action areas as defined by 2021 materiality assessment



Organisational governance



Labour practices



Human rights

The following core subjects were distinguished as areas of lower priority. These areas are not addressed separately in the CSR strategy; however, they still form part of the Group's overall strategy.

Areas of lower priority (in no particular order)



Environment



Fair operating practices



Community involvement and development

EVALUATION OF LOGICOM'S PERFORMANCE

Summary of the evaluation process



1. Determining the scope of the evaluation

Logicom has three divisions: (Distribution, Services and Infrastructure. Details of all Group entities are included in the annual Report and Consolidated and Separate Financial Statements for the year ended 31 December 2021 and are published on the Logicom Group's website. For the purposes of this materiality assessment, the companies in scope are found at <https://www.logicom.net/about-us/group-structure/>. The Investments sector is excluded.

2. Outcomes of the Gap Analysis for the Logicom Group

As evidenced by the gap analysis, the culture and character that have been developed within the Group stipulate its strong commitment to social responsibility initiatives. An exemplary number of formal procedures and policies are currently in place, which proves that actions have been taken in the context of corporate responsibility, and efforts have been made to improve and maintain the Group's high performance in relation to social reporting and its CSR.

From a strategic perspective, the latest gap analysis revealed that Logicom has demonstrated significant efforts in fully realising and defining what it wants the sustainability journey it has embarked on to look like.

Moving the company from having a reactive approach to CSR to a more strategic and proactive approach with a wider perspective on sustainable development will ensure that the success so far enjoyed by Logicom continues, and that it fosters a win-win relationship with society and the wider communities it operates within. This will help Logicom enter the next stage of CSR in a smooth and effective manner.

3. Identifying Logicom Group Stakeholders

In order for Logicom to identify its most important stakeholders to engage for the purposes of the materiality assessment, the following factors were taken into consideration:

- any party towards which it has legal obligations.
- any party that can be affected by its decisions and activities throughout its value chain.
- any party that would be disadvantaged if excluded from the engagement.
- any party that is likely to express concerns about Logicom's decisions and activities.

The types of stakeholders identified as important to engage with for the purposes of social responsibility are shown in Figure 6. The internal stakeholders are the members of the Board of Directors and the Employees. All the rest are considered as external stakeholders.

EVALUATION OF LOGICOM'S PERFORMANCE

Summary of the evaluation process

MAPPING OUR STAKEHOLDERS



▲ **Figure 6:** Logicom's most important stakeholders

The identification and selection of stakeholders to engage was the result of a workshop attended by representatives of Logicom's teams in all areas of operations. Each group of employees from different departments were requested to map their stakeholders in order to produce a list with the significant stakeholder groups that affect and are affected by the company's operations. Moreover, each group of stakeholders was classified in three different classes of importance depending on how critical the stakeholder group is perceived for the company's operations.

As part of Logicom's CSR strategy, the majority of the identified stakeholders are engaged once per year through surveys that aim to understand how they perceive Logicom and what expectations they currently have towards its business. The customers are engaged more often through customer satisfaction surveys.

EVALUATION OF LOGICOM'S PERFORMANCE

Summary of the evaluation process

4. Stakeholder Engagement for the determination of areas of focus

The stakeholder engagement for 2021 was achieved through a web-based survey. Due to the restrictions imposed by the pandemic of COVID-19, the Group considered the web-based survey to be the safest alternative to stakeholders' engagement events that require physical attendance. The survey focused on a materiality assessment by ranking the ISO core subjects in order of importance. Its aim was to evaluate Logicom's material focus areas based on which issues the stakeholders considered relevant and significant to Logicom, and help Logicom revise its sustainability strategy accordingly. The results of the materiality assessment are presented below.

In addition to the set of questions aimed at gathering the relevant information for generating the materiality matrices, other means were employed in the surveys to address adjacent matters regarding Logicom's social responsibility. The additional survey questions aimed at determining stakeholders' perception of how socially responsible Logicom currently is. The results are discussed in the section "CSR Strategy and roadmap" on page 45.

The stakeholders who were taking part in the survey were distinguished in two categories: internal and external.

4a. Internal Stakeholders Engagement: Web-Based Survey

The Board of Directors and the employees of the Group were identified as the internal stakeholders.

A total of 111 internal stakeholders were requested to complete the survey. The sample was designed to include non-executive directors, a number of employees whose views were considered in the base year assessment, and, extending the sample further, other employees from different departments of operation. The aim of the survey was to assess whether the internal stakeholders are aware of Logicom's current CSR activities and commitments and give their views in regard to the areas that they deem as material for Logicom to focus on. The internal stakeholders concluded on the following ranking of core subjects:

- | | |
|-----------------------------|---|
| 1 Human rights | 5 Fair operating practices |
| 2 Organisational governance | 6 Community involvement and development |
| 3 Labour practices | 7 Consumer issues |
| 4 The environment | |

EVALUATION OF LOGICOM'S PERFORMANCE

Summary of the evaluation process

4. Stakeholder Engagement for the determination of areas of focus

4b. External Stakeholders Engagement: Web-Based Survey

A total of 182 external stakeholders were invited to complete the survey. The survey link was circulated via personalised emails. The sample included stakeholders whose views shaped the material areas of focus at the base year, as well as stakeholders who were contacted for the first time. The aim of the survey was to understand how they perceive Logicom, and what expectations they currently have towards Logicom's CSR strategy and action plan. The core subjects were ranked in order of importance as listed below:

- | | |
|-----------------------------|---|
| 1 Organisational governance | 5 The environment |
| 2 Labour practices | 6 Consumer issues |
| 3 Human rights | 7 Community involvement and development |
| 4 Fair operating practices | |

The survey response rate reached 25%.

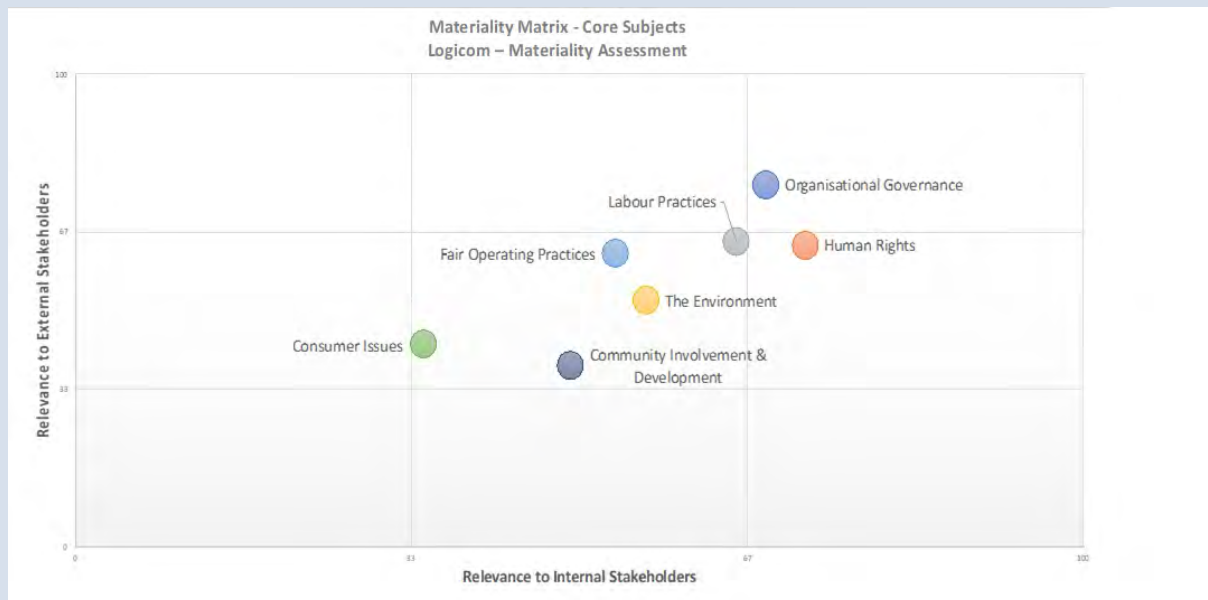
5. Outcomes of the Materiality Assessment for Logicom Group

The three core subjects, which were considered to be highly relevant by both the internal and the external stakeholders, are the priority areas that Logicom has chosen to focus on for its CSR strategy and CSR and Sustainability report. These are:



EVALUATION OF LOGICOM'S PERFORMANCE

Summary of the evaluation process



▲ **Figure 7:** Materiality Matrix for Logicom for 2021

Figure 7 shows how the materiality assessment of the ISO 26000 core subjects by the external stakeholders compares to the materiality assessment by the internal stakeholders. This materiality matrix will form the basis of Logicom's CSR strategy.

It is evident from the above procedure that the stakeholders continue to highly value this year, the same three core subjects of Organisational Governance, Labour Practices and Human Rights. These three core subjects and their relevant issues of interest are shown in Figure 9 below. The subject of Fair Operating Practices remains at a medium level of importance and significance for both internal and external stakeholders.

Community Involvement and Development ranked at the lowest level of importance by both groups. Compared to the early years results, where this subject ranked amongst the top 4 core subjects by external stakeholders, this year's results shows that they now have a better understanding of what CSR is and that they no longer view it as just a community of charitable events but as something more important. This proves that Logicom has made significant progress in educating its stakeholders on this subject.

Similarly, the topics of the Environment and Consumer Issues are deemed by stakeholders to be of low importance to the Group, as the effect of its operations do not have a significant direct impact on the Environment. For the Consumer issues, a possible explanation is that this subject has been sufficiently addressed by the company at the moment, as this appeared in the base year's materiality matrix and the Group is already taking action on its effect.

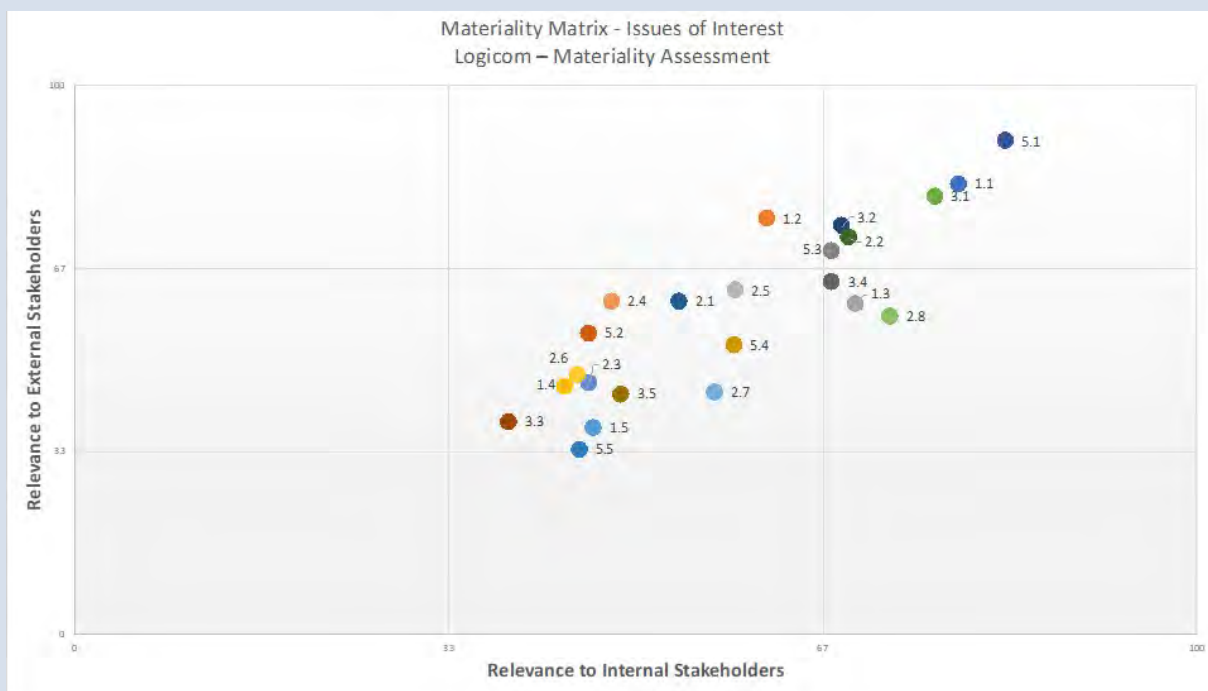
Having identified the top three ranking core subjects, the organisation's priorities were assessed at the level of issues of interest for each of the core subjects. In this way, the internal and external stakeholders' views were determined to greater detail and accuracy. Taking a closer look at the level of issues of interest, the organisation's priorities are ranked as follows:

EVALUATION OF LOGICOM'S PERFORMANCE

Summary of the evaluation process

High relevance to both internal and external stakeholders:

- 1.1 Ethical conduct
- 2.2 Human rights risk situation
- 3.1 Employment and employment relationships
- 5.1 Anti-corruption
- 5.3 Fair competition
- 3.2 Conditions of work and social protection



▲ Figure 8: Materiality Matrix of the ISO 26000 Issues of Interest for Logicom for 2021

The analysis of the stakeholders' views at this detailed level, revealed that, even though the core subject of Fair Operating Practices is not among the top three (refer to Figure 7: Materiality matrix for Logicom 2021), the issues of Anti-corruption and Fair competition that fall under this core subject are of high relevance and significance to both internal and external stakeholders.

Summary of the main takeaways from the Materiality Matrix of Issues of Interest:

23 issues of interest fall under the areas of high concern. Out of these, 19 issues of interest were identified to be of a medium or high relevance to both internal and external stakeholders, as shown in Figure 9. This implies total agreement between internal and external stakeholders on these issues of interest. No issues of interest were determined to be of low priority.

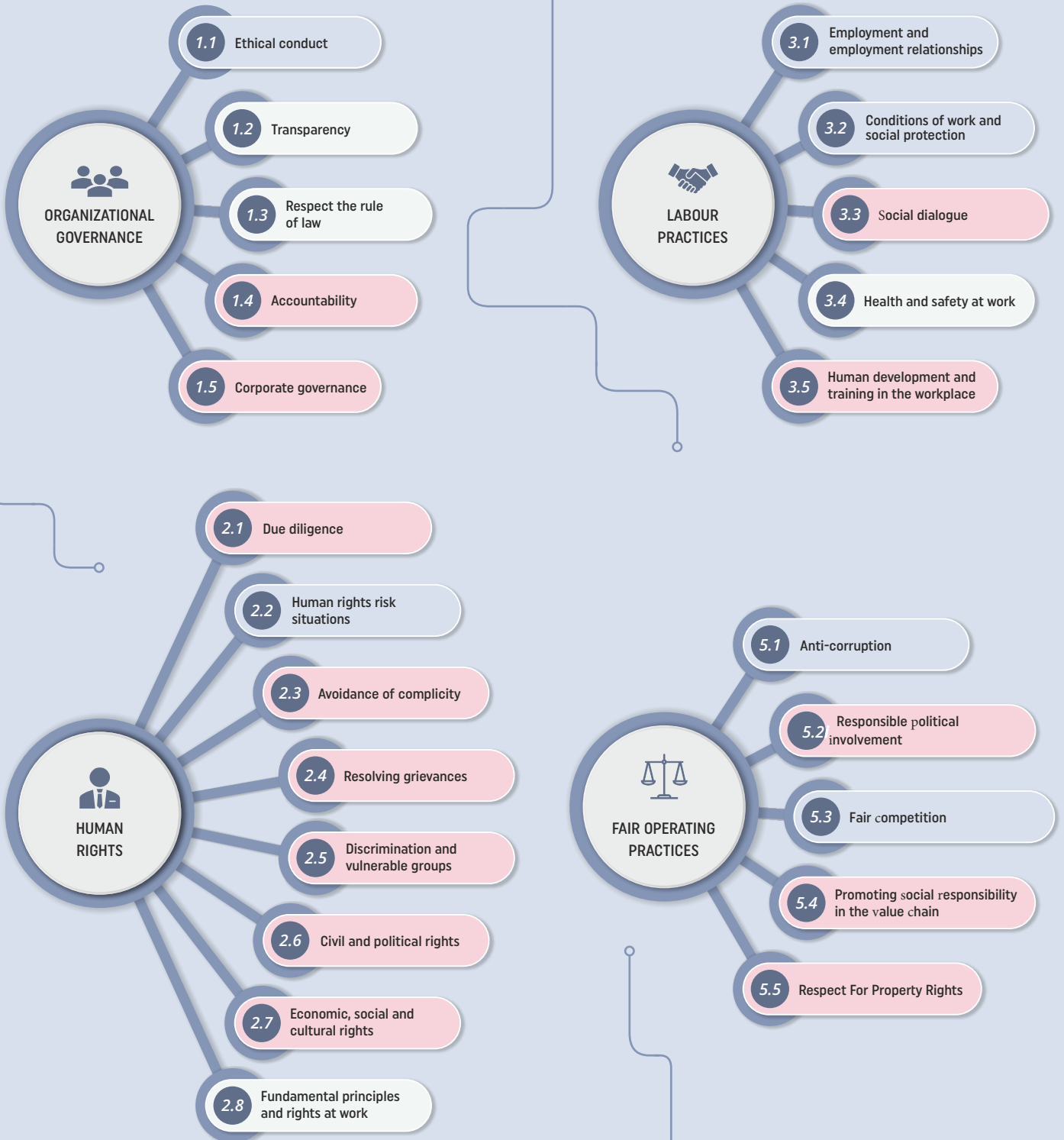
The issues of interest relevant to each core subject are shown in the figure below:

EVALUATION OF LOGICOM'S PERFORMANCE

• HIGH RELEVANCE

• MEDIUM RELEVANCE ISSUES OF INTEREST

Summary of the evaluation process



▲ Figure 9: Logicom's key material core subjects and issues of interest (2021)

EVALUATION OF LOGICOM'S PERFORMANCE

Summary of the evaluation process

Logicom intends to continue to focus on raising awareness on these three core subjects, which were selected as being highly relevant to both its internal and external stakeholders. Logicom will also initiate discussion on the highly relevant issues of Anti-corruption and Fair competition that refer to the core subject of Fair Operating Practices and continue to educate its stakeholders regarding CSR more widely.

As a result of the procedure discussed above and the material areas that this procedure has highlighted, the scope of the report is broadened compared to prior year to include the selected issues of interest that are under the subject of Fair Operating Practices. Consumer issues will remain as an area of focus since this core subject was taken into consideration when forming Logicom's CSR strategy in the base year and the Management considers it would be prudent to continue its efforts towards the achievement of the goals set. (Logicom does not deal with consumers directly. The term "consumer" refers to those individuals or groups that make use of the output of the organisation's decisions and activities.)



CSR STRATEGY AND ROADMAP



ORGANISATIONAL GOVERNANCE

Organisational governance is the system by which an organisation makes and implements decisions in pursuit of its objectives. Organisational governance can comprise both formal governance mechanisms based on defined structures and processes, and informal mechanisms that emerge in connection with the organisation's culture and values, often influenced by the persons who are leading the organisation. Organisational governance is a core function of every kind of organisation as it is the framework for decision-making within the organisation.

At Logicom, strong corporate governance is the foundation of our long-term success. The Logicom Board of Directors sets high standards for Logicom's employees, officers, and directors. Logicom has implemented the Cyprus Stock Exchange Corporate Governance Code since 2003, as part of our duty to serve as a prudent fiduciary for shareholders and to oversee the management of Logicom'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 to measure how well we are performing in relation to our shareholders, partners, and employees. The benefits arising from the diversity in the composition of the Board are recognised. The Board should be composed by members of high academic training and successful professional background, taking also into account that the experience is a significant element of perception and fair judgment. The necessity for diversity in the training and specialisation of the directors to optimally cover the requirements of Logicom's areas of operations also exists. In the evaluation of these criteria, no discrimination is made in regard to the gender.

Logicom's Board of Directors is comprised of seven members, five of whom are independent non-executive directors and two are non-independent executive directors. The Corporate Governance Committees are: the Nomination Committee, responsible for recommending new directors to the Board of Directors; the Remuneration Committee, responsible for the directors' remuneration packages; the Audit Committee, responsible for supervising the quality and accuracy of the financial statements, complying with legal and administrative rules, examining the professional level of auditors, their audit work and independence, as well as the performance of the internal control; and the Risk Management Committee, which is responsible for supervising the risk management systems.

For more information on the composition of the Board of Directors, please refer to the annual Report and Consolidated and Separate Financial Statements for the year ended 31 December 2021, located at the Logicom Group website.

WHERE WE STAND: |

The total number of Group employees for the year 2021 was **813**.

DECISION-MAKING PROCESSES AND STRUCTURES

■ *Diversity of governance bodies and employees*

Board of Directors:



All members of the Board of Directors are male.



All members are Cypriot citizens.



All members are older than 51 years old.

▲ **Figure 10:** Composition of the Board of Directors by age, nationality, and gender (2021)

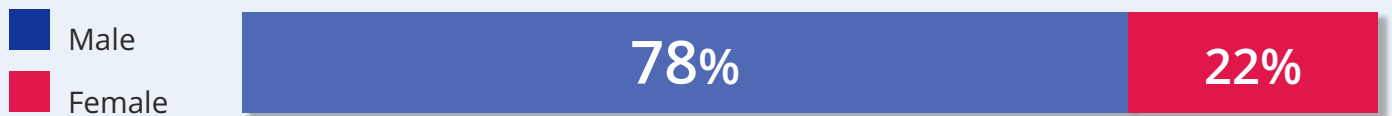
The members of the Board are chosen based on numerous criteria in order to achieve as much diversity as possible, however, the availability of suitable candidates with experience and expertise in this sector is always a critical factor in establishing diversity.



Management Personnel:

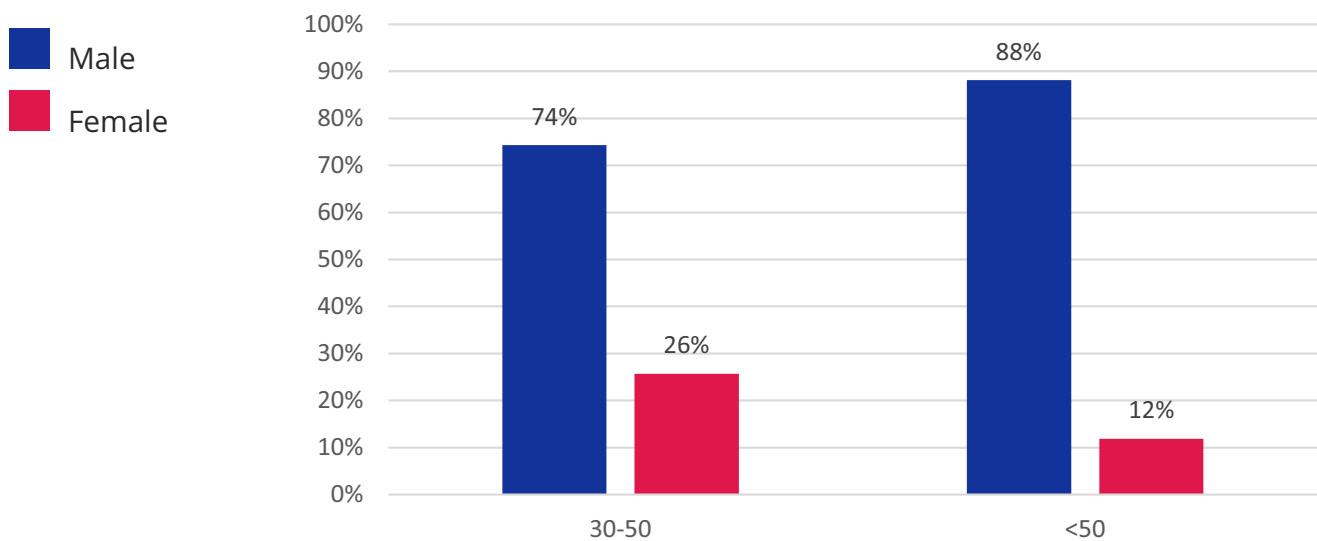
The composition of managerial personnel throughout Logicom is:

Male employees: **78%** Female employees: **22%**.



▲ **Figure 11:** Employees in managerial positions by gender (2021)

74% of managerial personnel between the ages of 30 and 50 are male while this percentage increases to 88% for the managerial personnel who are greater than 50 years old. There are no managerial personnel under the age of 30 years old.



▲ **Figure 12:** Employees in managerial positions by gender and age (2021)



Compared to the base year, the presence of women in managerial positions increased in total by 4%.



The decrease in both male and female employees in managerial positions in the age categories of under 30 and the increase of female employees in the age category over 50 years old is attributed to the ageing of employees holding these positions.

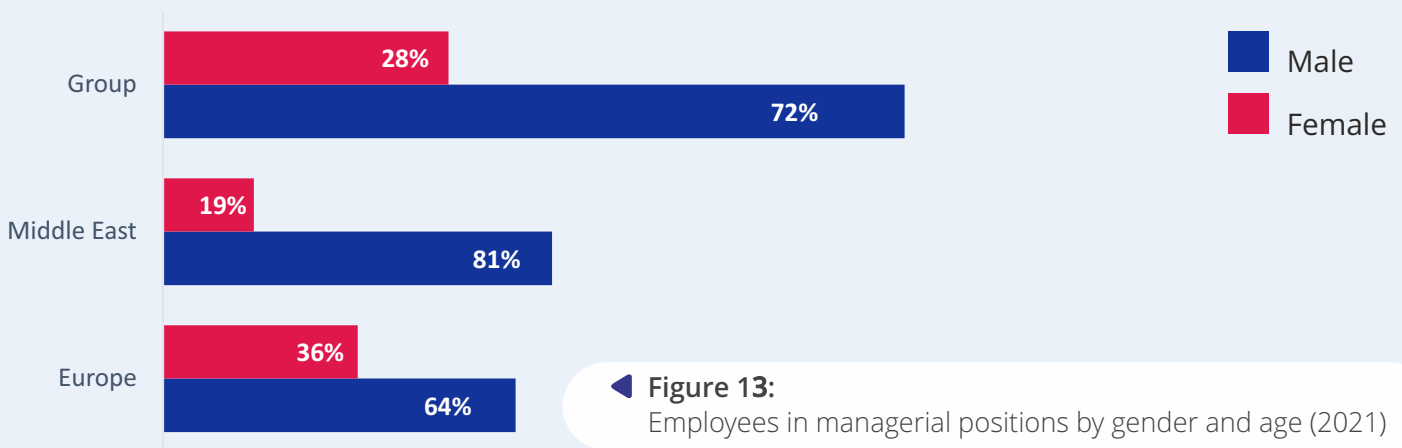
Employees:

Gender Groups:

Out of the 813 employees of the Group, 72% are male and 28% are female.

Region Groups:

Considering the different regions where the employees are placed, the split between Europe and Middle East is:



53% of the total employees are based in Europe, out of which 64% are male employees and 36% are female.

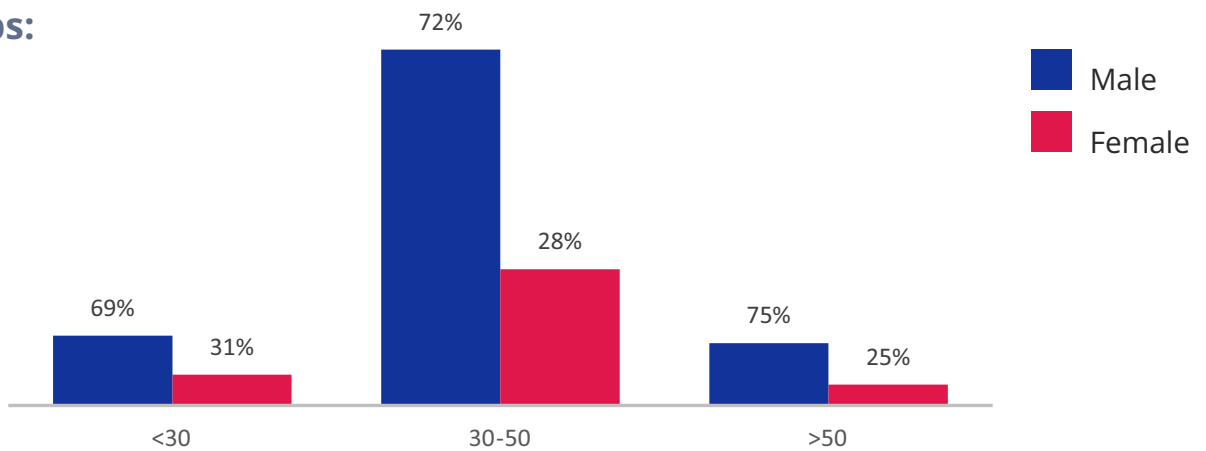
47% of the total employees are based in the Middle East, out of which 81% are male employees and 19% are female.

Overall, the split of the total number of employees into genders changed since base year due to the increase of female employees by 1%.

The majority of the group employees remain based in Europe and the split between genders by region remains approximately at the same levels for the Middle East, whereas in Europe the split changed due to increase of female employees by 2% compared to the base year.



Age Groups:



▲ Figure 14: Logicom employees' age by gender (2021)

15% of the total employees are under 30 years old, 69% of which are male and 31% are female.

73% of the total employees are between the ages of 30 to 50 years old, out of which 72% are male and 28% are female.

12% of the total employees are over 50 years old, out of which 75% are male and 25% are female.

In 2021, the percentage of employees at the age group below 30 years old increased to 15% compared to 8% in the base year, whereas the percentage of employees at the age group of 30 to 50 years old decreased to 73% compared to 83% in the base year. The percentage of employees above 50 years old also increased to 12% compared to 9% in the base year. This increase is attributed to the ageing of the existing employees and not due to new hires.

Nationalities:

The nationalities of the employees are show in figure 15:

31 different nationalities including:

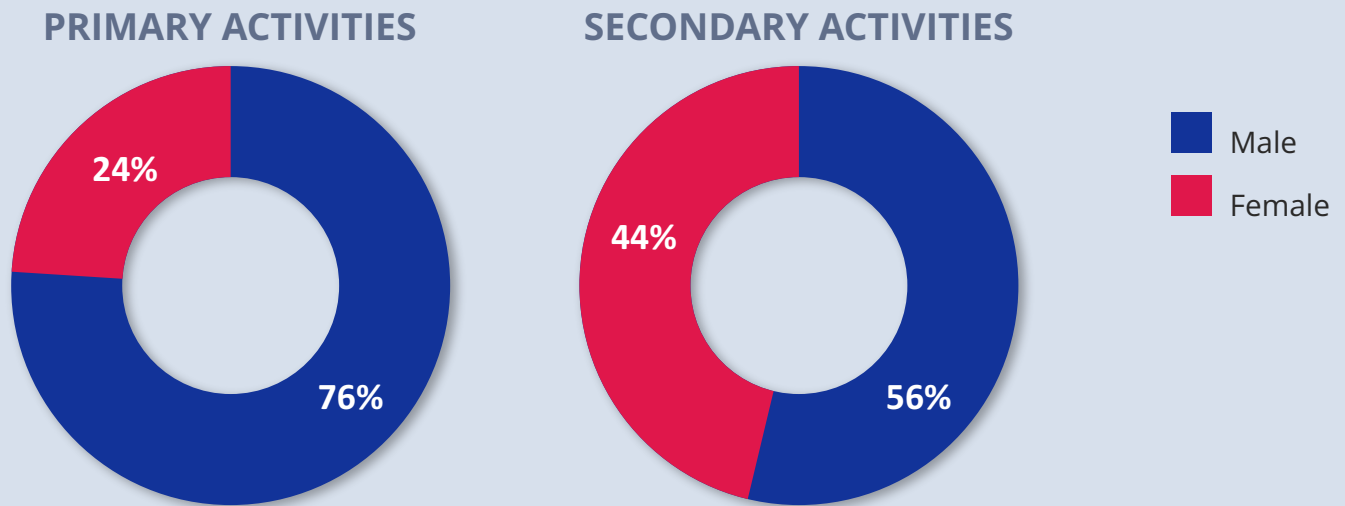
Albanian (2, Australian (2, Bangladesh (1, British (2, Bulgarian (1, Cypriot (234, Egyptian (21, Filipinos (5, Greek (105, Indian (209, Iranian (1, Italian (22, Jordanian (43, Lebanese (12, Maltese (1, Moroccan (7, Nepali (2, Omani (3, Pakistani (9, Palestinian (3, Polish (1, Romanian (63, Russian (1, Saudi Arabian (35, South African (1, Sri Lankan (4, Sudanese (1, Swedish (2, Syrian (14, Turkish(2, and Yemeni(4.



Figure 15: Logicom employees' nationalities (2021) ▶

Employees by department category:

The allocation of employees to primary and support activities is based on Logicom's value chain as presented in figure 4.



▲ **Figure 16:** Logicom employees' gender by department (2021)

The split of employees between the primary and support activities is 80% and 20%, respectively. These percentages remain unchanged since the base year. The presence of women in the primary activity departments increased by 1% compared to the base year.

Overall, Logicom, as an IT Group of companies, tends to attract more male employees, especially in the primary activities' departments of Management, Technical, Warehouse, and Sales & Marketing. Another factor that explains why there are more male employees, is the geographical dispersion, as 47% of Logicom employees are located in the Middle East, where the gap between male and female employees inevitably widens. The ratio of skilled female vs male workforce in the Middle East is lower than that in other regions we operate in, and this also affects the gender equality factor. However, even under these circumstances, Logicom's Management endeavours have achieved the employment of a significant number of female employees in the Middle East, especially in Saudi Arabia.

■ **Employees by employment contract and gender:**

The majority of the Group employees (99,5%) are employed under permanent/indefinite term contracts. Only 0,5% of the Group employees are employed under fixed term/temporary contracts, 1 male and 3 females, all based in Europe.

■ **Permanent employees by employment type and gender:**

All permanent employees are full-time employees. None is under part-time employment.

■ Work performed by self-employed workers or contractors does not form a substantial portion of Logicom's work. The total workforce of 813 employees refers only to employees' category, no supervised workers exist.

■ **Logicom's operations are not affected by seasonality;** therefore, there are no significant variations in employment numbers throughout the year.

■ **Compilation of data:** All the data that were used to produce the above statistics that refer to Logicom's employees and the application of the Group's policies were provided by the Human Resources Department Database.

■ Logicom does not employ any personnel under collective bargain agreements.

■ **Logicom's response to the precautionary approach:** The Group, through its operations, does not have a significant effect on the environment. However, as it is very conscious of the role it plays towards contributing to the environment, Logicom Public Ltd and Logicom Solutions Ltd has adopted the ISO14000 series of standards as an overall framework for addressing environmental issues and its related impacts in a systematic and holistic manner.

■ **Logicom's subscription or endorsement to externally developed economic, environmental, and social charters, principles or other initiatives:** Logicom Public Ltd and Newcytech Business Solutions Ltd has endorsed the external initiatives driven by the Cyprus Chamber of Commerce and Industry (CCCI) for the establishment of the non-for-profit organisations: AFIS Cyprus, WEEE Cyprus, and Green-Dot Cyprus. The principal activities of these organisations are the management of batteries waste, electrical and electronic equipment waste, and packaging materials waste. The Company is a founding member of these organisations.

Logicom's Memberships of associations

Logicom is a member of the following associations:

- Nicosia Chamber of Commerce and Industry: Logicom participates, through a company official, in the Board of Directors and the Chamber's Services Committee. The Company is a frequent sponsor of events/ actions initiated by the Chamber of Commerce and Industry, which promote good business practices, compliance with legislation or EU Directives, and global trends.
- The Employers and Industrialists Federation (OEB), in which Logicom, through a company official, participates in the Board of Directors.
- The Cyprus Information Technology Enterprises Association (CITEA): The Association is housed by the Employers' and Industrialists' Federation of Cyprus. Logicom participates, through a company official, in the Board of Directors.
- The Federation of Hellenic Information Technology & Communications, Enterprises (SEPE).
- Amcham Cyprus (American Chamber of Commerce in Cyprus), in which Logicom, through a company official, is a member of its Board of Directors.
- Global Technology Distribution Council (GTDC): GTDC is a worldwide industry association dedicated to defining and promoting the role of wholesale distribution in a successful and healthy information technology channel. The Council is comprised of the computer industry's top distributors dedicated to serving "the channel," a network of skilled solution providers, Internet resellers, and retailers focused on providing hardware, software, and services to businesses and consumers around the globe. The GTDC is governed by its Executive Committee and Board of Directors, which consists of senior management representatives of the organisation's members. Logicom participates, through a company official, in the Board of Directors.
- TechIsland Association is a non-profit association with a mission to promote and accelerate the growth of technology and innovation ecosystem in Cyprus. Logicom is a founding member and serves on the Board of Directors.
- Cyprus Integrity Forum (CIF) is an independent, non-politically partisan, and non-profit organisation in Cyprus that fights against corruption and for the promotion of transparency. Logicom became a member in 2020, after successfully completing the formal due diligence process regarding its posture against bribery & corruption, transparency, and ethical practices application.
- CSR Cyprus: is a non-profit association and is the national business network for Corporate Social Responsibility (CSR) in Cyprus.

ACCOUNTABILITY

A strong **communication of values** inside and outside the organisation are very important in establishing the company as a strong and reliable business partner to all of our customers.

The optimisation of the communication of Group's values to its stakeholders is also attainable through its website, which was redesigned recently with the aim to improve the experience of the stakeholders and to serve their needs better. An anonymous feedback system is also in place to serve as a line of communication between Logicom and its global users.

ETHICAL CONDUCT

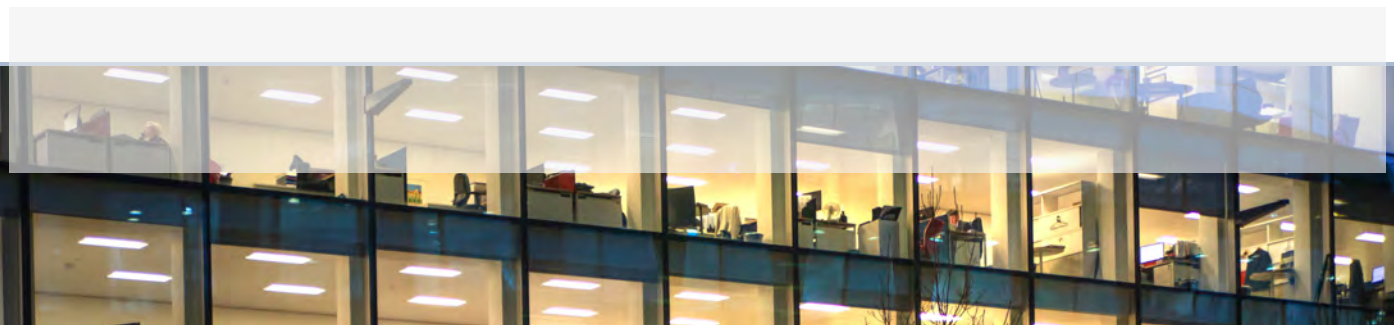
Ethics and integrity are core values that are well embedded in Logicom's way of doing business. Logicom has a formal written **Code of Business Conduct**, which together with the **Ethics and Compliance Manual**, sets the standards of business conduct for its immediate stakeholders and provide a solid safeguard to the organisation. Logicom is also fully compliant with all national and local laws and regulations that apply to the Group of the countries in which it operates.

TRANSPARENCY

The Group ensures all communication is kept simple, lucid, and transparent in a manner that it is understandable by its entire stakeholder community.

CORPORATE GOVERNANCE

At Logicom, **corporate governance** is driven collectively by the Board of Directors (BoD). The committees that fall under the BoD that are responsible for decision- making are the Audit Committee, the Risk Management Committee, the Remuneration Committee, and the Nomination Committee, as explained on page 36. Full details on the formation and duties of the Committees and of the BoD are described in Logicom's Corporate Governance Report, which is part of the annual *Report and Consolidated and Separate Financial Statements for the year ended 31 December 2021* found on Logicom's Group website.



Stakeholder engagement:

The Group postponed the planned stakeholder engagement event, as a result of the outbreak of the Coronavirus pandemic (COVID-19), and a web-based survey was organised instead.

The aim of the survey was to determine the materiality matrices (please refer to pages 32 and 33), but, at the same time, to determine the stakeholders' perception of how socially responsible Logicom currently is.

Stakeholders responses revealed that the vast majority currently perceive Logicom as a fairly socially responsible organisation, which still has a lot of potential for further improvement. More specifically, stakeholders noted that their perception is that Logicom is placing a lot of focus on the areas of Organisational Governance and Labour Practices, denoting that Logicom has been particularly effective in communicating its values related to social responsibility inside and outside the organisation, as well as in communicating some of the areas of focus. Furthermore, the external stakeholders, recognising the Group's impact as an established business leader, suggested that it should place focus on promoting anti-corruption and ethical business conduct among the business communities in the countries of its operation, through organised events and seminars that would accentuate the long-term benefits of businesses to act responsibly. This is particularly important to Logicom, as it is evident that the stakeholders' understanding of corporate social responsibility has broadened, and they have come to realise the necessity of 'embedded CSR', which is part of an organisation's core competencies and integrated in its strategy, routines, and operations, rather than 'peripheral CSR' which focuses on philanthropy and volunteering.

It is important to note that, while the external stakeholders were more concerned about fair operating practices issues and their promotion to the business world, the internal stakeholders were more concerned with environment protection and the promotion of technology as an investment for society.

The survey also concluded that, while Logicom made progress in the communication of its strategy and CSR activities executed to the internal stakeholders, and even though all the stakeholders are aware of Logicom's sustainability areas of focus, most of the external stakeholders were not familiar with any CSR activities that Logicom executed. This implies that there is still a gap in the communication of activities, and Logicom should proceed with better means to communicate its CSR activities at an external level.

Finally, it is worth noting that the stakeholders engagement unveiled that they consider an organisation's social responsibility as an important factor in their decision to work for them. This provides Logicom with a competitive advantage, given its ongoing efforts towards being socially responsible and its commitment to improving its social responsibility even further, as there is strong evidence that CSR is vital for every organisation. Logicom should continue working towards developing its CSR in order to attract employees and business partners and enjoy the support of local communities.

Stakeholder engagement:

Selected quotes from the survey:

"A socially responsible organisation gives it a competitive edge, improves its profitability and value and increases its customer loyalty."

"Apart from the purely ethical reasons for preferring to work with socially responsible organisations, working with such organisations enhances one's own reputation and also enables one to learn from the best practices used by such organisations."

"Employees that work for a socially responsible organisation tend to be happier, more engaged to their work and have higher productivity"

"To engage in CSR means that, in the ordinary course of business, a company is operating in ways that enhance society and the environment instead of contributing negatively to them.

Through CSR programmes, philanthropy, and volunteer efforts, businesses can benefit society while boosting their brands (business case of CSR). This shows, inter alia, that the organisation has a firm corporate management and a long-term strategic plan."

"A partnership is about doing business together but also share a vision and values. The wrong partner could damage our reputation."

"It is very important for a banking institution nowadays that the businesses they finance are socially and environmentally responsible without breaching any human rights, laws, etc."



Focus Areas:

Continuous monitoring to ensure that adequate resources are allocated in order to maintain this high level of performance in this area, since it is of utmost importance to Logicom that all issues under this area are addressed extensively.

What we achieved up to 2021

- ✔ Diversity and inclusion non-discrimination policy completed and shared with Logicom's employees and management. Refers to "Equality and Diversity Policy" document published on the Logicom internal website (Intranet/Employee Portal).
- ✔ Upgrading of the existing ISO 9001:2008 Quality Management System and ISO 14001:2004 Environmental Management System (Logicom Public only) against the revised ISO 9001:2015 and ISO 14001:2015 to manage the risk arising from Logicom's operations, completed successfully for the Cyprus based companies.
- ✔ Stakeholders' engagement: Mapped our stakeholders and set up an engagement plan, alongside with a communication plan. Engagement achieved annually through online surveys.
- ✔ A Stakeholder engagement event was organised in 2019, being the first event of its kind in Cyprus. No subsequent events were held due to the outbreak of the Coronavirus pandemic (COVID-19).
- ✔ CSR budget to cover the core CSR activities has been assigned by the Management at a Group level during the annual budgeting process of the organisation and will be reassessed annually based on the short-term CSR strategy.
- ✔ The parent company has been certified in 2019 for the ISO 37001:2016 for the Anti-Bribery Management System.
- ✔ Implementation of Ethics and Compliance manual summarising all key compliance obligations and policies for our employees.
- ✔ Redesigned, completed and shared our onboarding procedure for Business associates. The new procedure places special care on ethics and integrity principles, Anti-bribery and Corruption principles, Data Protection, Competition Law, and US and EU export regulations.
- ✔ The principles of ISO 37001:2016 Anti-Bribery Management system have been communicated and applied to all Logicom companies.
- ✔ The implementation and certification of the Business Consulting Services and Technical Solutions Services departments of the subsidiaries Logicom Solutions and ICT Logicom Solutions S.A. with ISO 27001:2013 "Information Security Management System" has been achieved in order to improve the security of the companies and customers' information.
- ✔ CSR trainings to local CSR teams in all group companies who will further transmit the philosophy to their colleagues and teams. Assignment of responsible teams in all companies who are responsible for initiating and coordinating activities relevant to the Group's strategy and act as the liaison between the subsidiaries and the central team.
- ✔ CSR eLearning training was conducted for all employees of the Group in 2021. The training included an introduction to Corporate Social Responsibility and ISO 26000 and a brief presentation of the Group's strategy and actions.
- ✔ Implementation of Environmental KPIs for all Group companies. Specifically, the Group currently measures its electricity and fuel consumption, and its CO2 emissions from travelling abroad, and is considering reduction or rectification measures to minimise to the most possible extent, its effect on the environment.
- ✔ The implementation and certification of the subsidiary company Logicom Solutions Ltd with ISO 20000-1:2018 "Service Management System" has been achieved in order to improve the services provided to the customers.

Where are we headed:

Note:



Goals in progress




Goals Completed





Goals planned




Short-term goals:

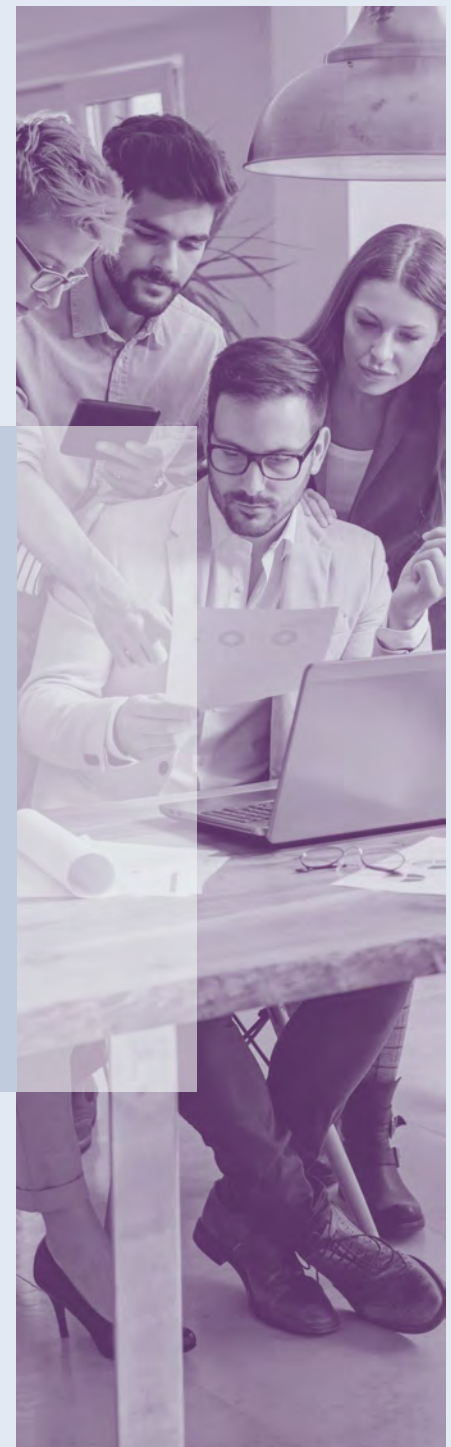
-  The implementation of a Business Continuity Management System and the certification with [ISO 22301:2019](#) Security and resilience – Business continuity management system for Logicom Solutions Ltd.

Mid-term goals:

-  Strengthen communication of CSR strategy and actions internally and externally for continuous education of stakeholders.
-  Monitoring of environmental KPI's and implement an action plan for minimising the Group's footprint.
-  Prepare an agenda on a series of stakeholders' engagement actions across the Group countries of operation.

Long-term goals:

-  Inclusion of key performance indicators (KPIs) for societal risks identified.
-  To continue working towards attracting more diverse talent.
-  Continuous monitoring to ensure application of the guidelines and principles of Anti-Bribery and Corruption management system across all Logicom subsidiaries.



CSR STRATEGY AND ROADMAP



LABOUR PRACTICES

The labour practices of an organisation encompass all policies and practices relating to work performed within, by or on behalf of the organisation, including subcontracted work. Labour practices extend beyond the relationship of an organisation with its direct employees or the responsibilities that an organisation has at a workplace that it owns or directly controls.

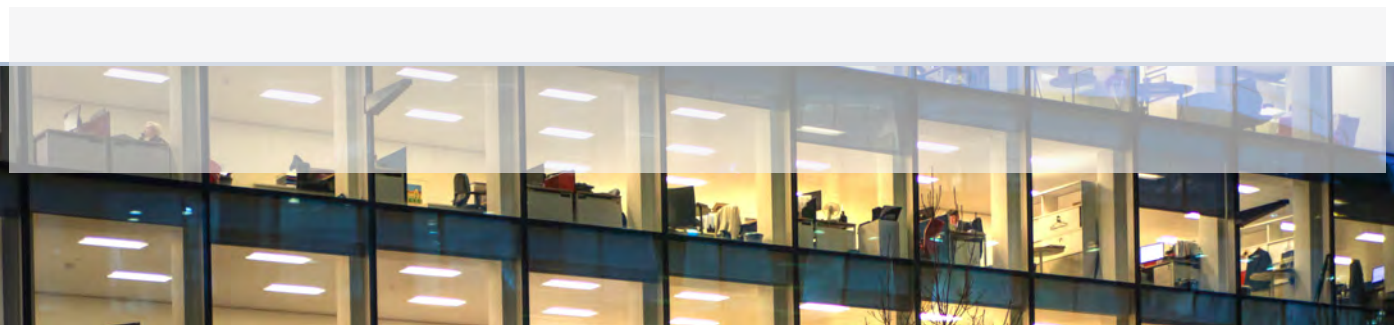
Labour practices include the recruitment and promotion of workers; disciplinary and grievance procedures; the transfer and relocation of workers; termination of employment; training and skills development; health, safety, and industrial hygiene; and any policy or practice affecting conditions of work, in particular working time and remuneration.

Undoubtedly, among an organisation's most important economic and social contributions are the creation of jobs, as well as wages and other compensation paid for work performed. Meaningful and productive work constitutes a key and vital element for human development; standards of living are bettered through full and secure employment. On the other hand, the absence of secure employment is the root of many social problems. Labour practices greatly affect the respect for the rule of law and sense of fairness within society. Hence, socially responsible labour practices are key to social justice, stability, and peace.

Our employees are the driving force behind our success, and our diverse workforce is the source of our strength for achieving our objectives.

Logicom treats its people with dignity and respect and is an equal opportunity employer. It does not discriminate against anyone based on gender, race, colour, religion, age, mental or physical disability, political beliefs, or any other legally protected trait. Harassment, violence, and bullying of any form are not tolerated by any means.

Logicom takes the health, safety, and welfare of its employees very seriously and, as such, it seeks to minimise and eliminate the risk of labour incidents/accidents in the workplace and does everything in its power, to protect and sustain the health of all personnel.



WHERE WE STAND:

EMPLOYMENT AND EMPLOYMENT RELATIONSHIPS

■ Proportion of senior management hired from the local community at significant locations of operation:

Senior Management refers to the highest level of managers in Logicom, i.e., Directors and General Managers. Local community refers to the country where each Logicom subsidiary company is based. The most significant areas of operation, for Logicom based on the % of total revenues are UAE, Saudi Arabia, Greece, and Cyprus.

In total, 66% of total senior management (includes all directors, senior managers and general managers are locals (as per the GRI definition), where the remaining 34% are foreigners, compared to 64% local vs 36% foreigners in the base year.

100% of the senior management in Cyprus and Greece is hired from the local community, whereas all senior management in UAE are expatriates.

■ Total number and rate of new employee hires during 2021 by age group, gender, and region:

172 people left the company and 258 were recruited during 2021, i.e. 1:1,70 compared to 1:1,25 in the base year. (Positions that have been cancelled are excluded.)

40% of the new hires were based in Europe and 60% in the Middle East.

64% out of the 258 new hires were male and 36% female employees. (Base year: 72% male, 28% female)

Logicom, in collaboration with one of its major vendors, hired young employees within the scope of the 'Xsell' programme. The programme is a Development and Sales practice initiative under which these associates are being trained by the vendor and apply the acquired skills in the field for a period of 14 months, after which they assume a position within Logicom. During 2021, this programme was implemented in Saudi Arabia.

Logicom also has a periodic internship programme in collaboration with the local universities under which students are employed for the summer season in relevant positions in any of Logicom's subsidiaries depending on the business needs of the current year.

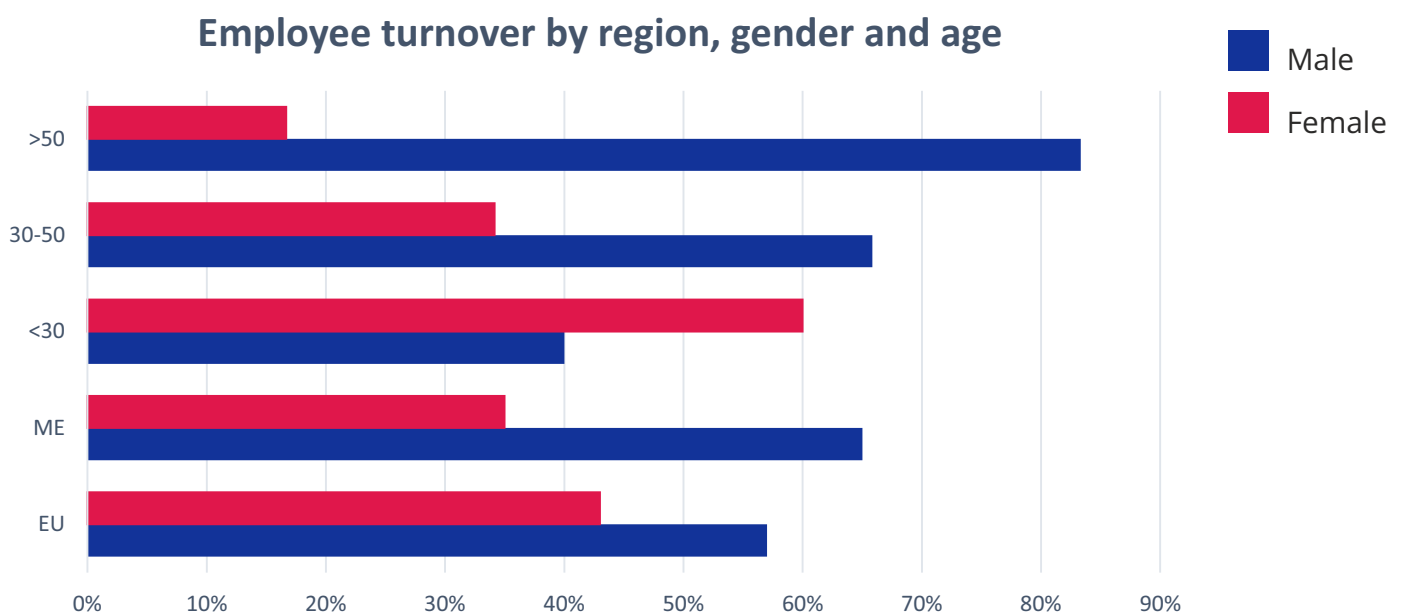
■ Employees with physical disabilities: 0,37% out of total employees, 67% male and 33% female, in the regions of Europe and Middle East. The decrease of the % compared to prior years is due to the retirement of employees.

■ Total number and rate of employee turnover by age group, gender, and region: During 2021, the turnover ratio was 24% (Base year: 20,8%) (Leavers divided by the total number of employees at the beginning of the year).

The breakdown of the turnover total by age group of the employees that left the organisation, presented below in figure 18, is as follows:

At the under 30 age group, the turnover is 23% (base year: 13%), at the age group of 31 to 50, the turnover is 70% (base year: 84%), and at the ages over 50, the turnover is 7% (base year: 3%).

Out of the total employees that left the Group, 39% were female compared to 61% male employees, while, 52% were from the Middle East region and 48% from Europe.



▲ Figure 17: Employees turnover by region, gender and age (2021)

CONDITIONS OF WORK AND SOCIAL PROTECTION

- Ratio of basic salary and remuneration of women to men by employee category and by significant locations of operation:

The employees' categories by department and level were split based on information collected through the human resources system into the departments of sales, finance, operations, technical, and administration for each company throughout the Group's operations.

However, due to the fact that most positions are unique and part of small departments (in terms of headcount), it makes it impossible to provide salary information without revealing the employees' identity.

- No part-time employees existed in 2021, however, as a practice, the benefits provided to full-time employees and part-time employees are equal.

■ **Ratio of standard entry-level wage by gender compared to local minimum wage:**

The wage level offered by the Group to its employees in all countries of operation is higher than the local minimum wage irrespective of gender.

■ **Total number of incidents of discrimination and corrective action taken:**

No incidents of discrimination were recorded for the year through the established procedure mechanism.

■ **Parental leave**

Logicom employees are entitled to parental leave in accordance with local law provisions. Percentage of entitled employees that took parental leaves in 2021 are presented in figure 18 below. (Parental leave is an employee benefit that provides job-protected leave from employment to care for a child following its birth or adoption. Refers to paternity, maternity, and other parental-related leaves.)

PARENTAL LEAVE 2021

47% 

Male employees that took parental leave

53% 

Female employees that took parental leave

▲ **Figure 18:** Parental Leave

Return to work rate: **96.67%**

(Employees that used parental leave and returned to work after the end of its duration)

Retention rate: **71.43%**

(Employees that used parental leave and returned to work and remained >12 months)

■ **Defined benefit plan obligations and other retirement plans:**

The Group contributes to a defined benefit end of service plan in subsidiary companies based on the local legislation. The contributions refer to the subsidiary companies in Greece, Italy, United Arab Emirates, Saudi Arabia, Kuwait, Oman, Qatar, Bahrain, Lebanon, and Turkey. For details on the amount of the provision recorded, the actual amounts paid, and assumptions used, please refer to the Group's annual Report and Consolidated and Separate Financial Statements for the year ended 31 December 2021.

■ **Significant actual and potential negative impacts for labour practices in the supply chain and actions taken:**

Logicom's four major suppliers were assessed for their impact on labour practices. All of them are major corporations and they operate in a fully transparent manner, report on their CSR practices, and make extensive references to their labour practices and their employees' welfare. Therefore, none of them were identified as having significant actual or potential negative impacts.

SOCIAL DIALOGUE

Notice of significant operational changes to employees affected is set as a minimum in accordance with the legal requirements in each country and varies according to the employment contract of each employee. (Logicom does not employ any personnel under collective bargaining agreements.)

HEALTH AND SAFETY AT WORK

■ **No work-related ill health recorded in 2021.**

Logicom is very sensitive to health, safety, and welfare of its employees, as far as is reasonably practicable. Therefore, Logicom aims to minimise and eliminate the risks of labour incidents/accidents and does everything in its power, to protect and sustain the health of all personnel. A qualified Health and Safety Consultant has carried out a risk assessment for the Cyprus-based offices. The most important Health and Safety risks were identified and managed by the respective employees.

The Logicom Group Manual of Policies and Procedures outlines the procedures for the development of emergency response plans and the organisation of emergency response drills and trainings.

Logicom Employment Medical Assessment Policy

- Logicom recognises the importance of an employment medical assessment to ensure that both prospective candidates and existing employees have the physical and mental capacity to perform their assigned duties and responsibilities. In 2020, the Employment Medical Assessment Policy was introduced for the employees of Cyprus-based companies. This Policy aims to safeguard the prospective candidate and current employees from potentially endangering themselves and their colleagues during the execution of their employment duties due to personal impediments. For this purpose, a company doctor was engaged to perform the medical assessment.

The Logicom Flu Vaccination Programme

- The Logicom Flu Vaccination Programme was also introduced in 2020 to offer free flu vaccinations to all employees wishing to get one in Cyprus on a yearly basis.

■ **Logicom's Response to Covid-19**

During the early days of 2020 and up to 2021, Logicom had to face the unprecedented challenges of the Covid-19 pandemic. The outbreak of this pandemic created an environment where companies across the world had to safeguard the health of their employees while maintaining their operational ability. Logicom's reaction was fast, and its first concern was to secure the good health and the well-being of its employees and society at large.

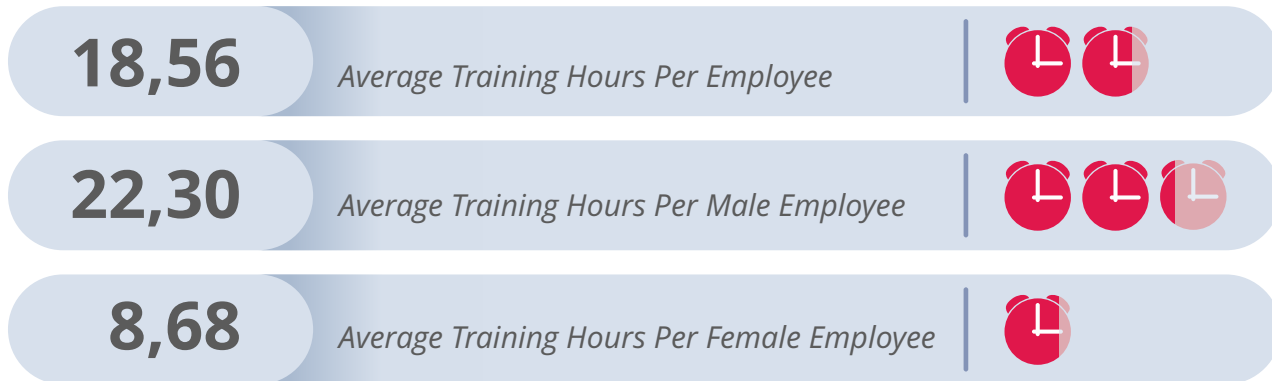
- An Epidemiologist was engaged to assist in the prevention and control of the pandemic in the workplace. The Epidemiologist issued monthly reports to the Management, which provided guidance on the preventive measures that the Group companies and its personnel should apply to prevent the spread of the pandemic and safeguard their good health.
- Strict adherence to the restrictive measures announced by local governments in the countries where the Group operates.
- While most of our employees were already equipped to work from home, we increased our capacity to support remote working for all our employees in all countries of operation.
- Our premises were equipped with personal protective equipment, as proposed by the epidemiologist, and regular thorough disinfections of the premises were conducted.
- Weekly Covid-19 testing was made obligatory for all employees. High-risk employees were tested twice a week. The cost of the tests was covered by each Group company.
- Informative circulars, as prepared by the Epidemiologist, were forwarded to all employees for their acknowledgment, and specific instructions were given to employees whose tasks required extra precautionary measures.
- An action plan set for reaction to Covid-19 positive cases at the workplace, according to the Epidemiologist's instructions and Government directives.
- Outsourcing of the inspection of our premises, including our business functions and employees' behaviour in the workplace, to confirm compliance with the pandemic precaution measures and directives.



HUMAN DEVELOPMENT AND TRAINING IN THE WORK PLACE

■ Average hours of training per employee by gender for the year 2021:

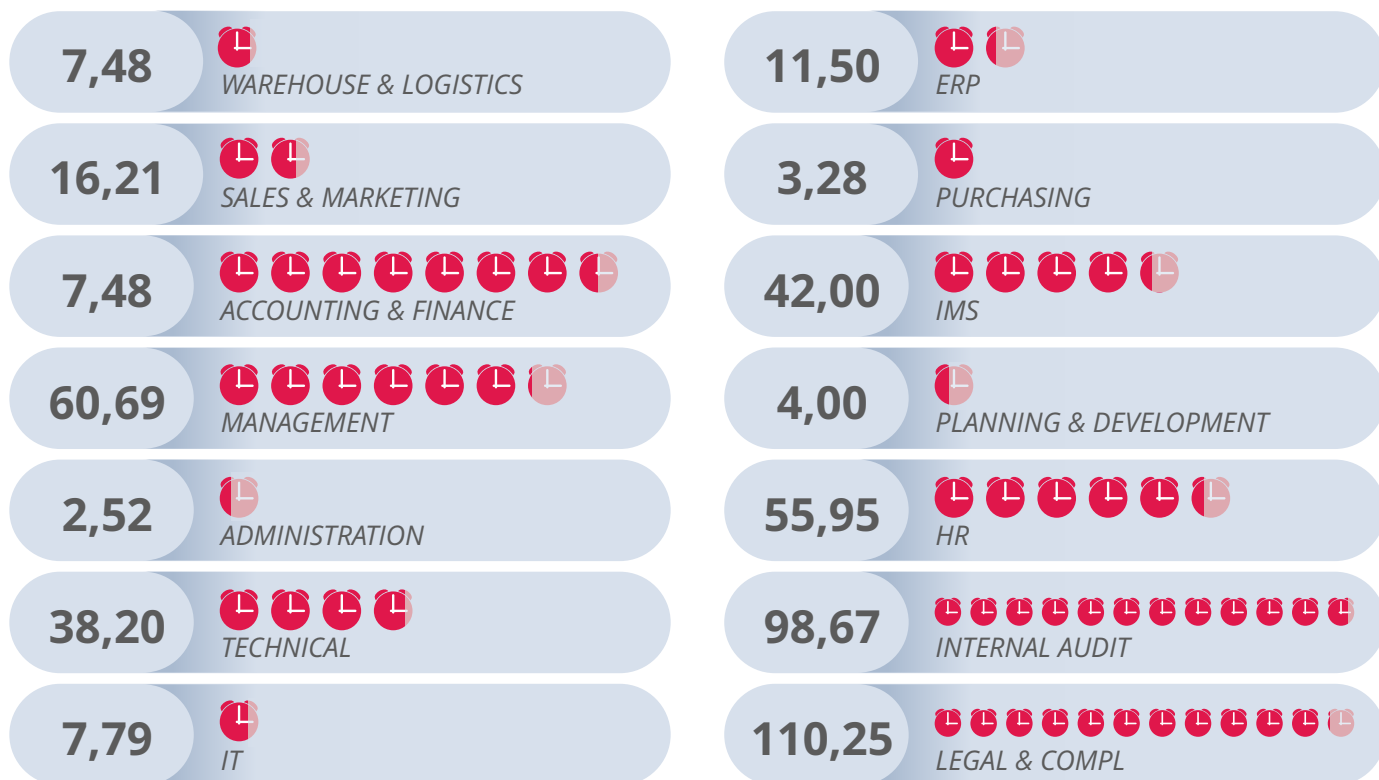
AVERAGE TRAINING HOURS



▲ **Figure 19:** Average training hours (2021)

The total hours of trainings have increased compared to the base year by 11,29 hours per employee, 14,56 hours per male employee, and 2,65 per female employee.

■ Average training hours per employee category:



▲ **Figure 20:** Average training hours (2021)

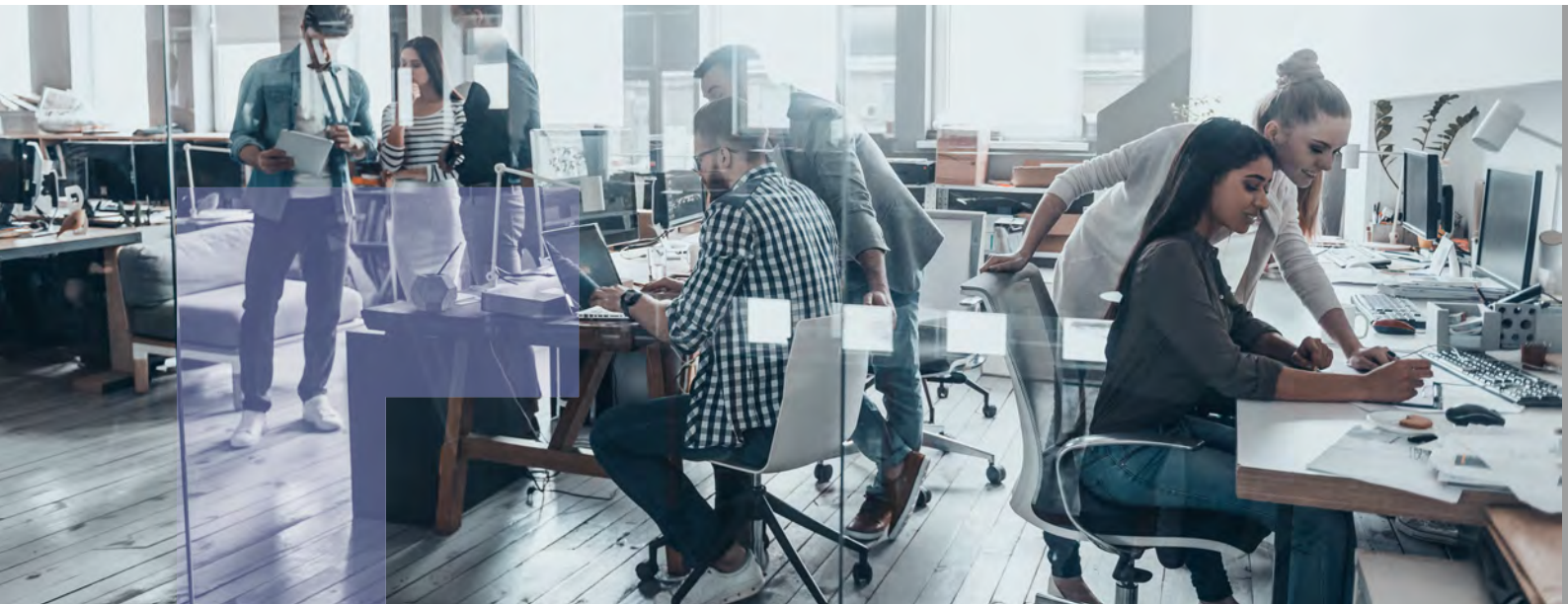
CSR STRATEGY AND ROADMAP |  LABOUR PRACTICES

Logicom has a formal procedure to be followed by the employees in order to request, attend, and subsequently evaluate trainings.

Employees are encouraged to continuously develop their skills through training programs offered either by external parties or internally, which are funded by the company.

In addition to the above numbers reported, Logicom employees attend conferences and other events through which they received professional training and education. These hours are not tracked and are not included in the above metrics.

- Currently, Logicom has no transition assistance programme for retired employees.
- **Percentage of employees receiving regular performance and career development reviews:** Logicom has a formal performance appraisal procedure in place that is mandatory for all employees on an annual basis.



Focus Areas:

Employment and employment relationships

Logicom provides its employees all the benefits that are required by the relevant laws in the countries in which the Group operates. The company has excellent relationships with its workforce and maintains employee satisfaction by offering a pleasant working environment.

Conditions of work and social protection

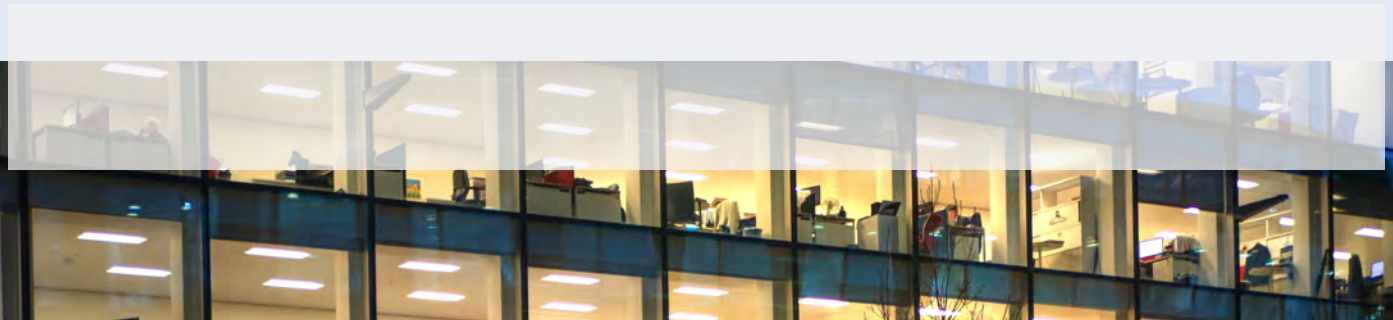
Logicom provides secure employment to its employees in compliance with the relevant national laws and regulations and in consistency with applicable international labour standards. In addition, it is cautious to provide conditions of work that permit, to the extent possible, work-life balance, as it is an important aspect of a healthy work environment. National and religious traditions and customs of employees are fully respected by the organisation.

Health and safety at work

Health and safety at work is taken very seriously. All procedures and guidelines are practiced at all places of operations to ensure that risks are minimised. These guidelines are reviewed on a regular basis and monitored by Management to ensure that they are implemented in all Logicom's facilities.

Human development and training in the workplace:

Training programmes and employee development are of high importance to the organisation. A developmental plan is mutually agreed between each employee and his/her manager through the newly relaunched performance appraisal system. Trainings are organised either collectively or on an individual basis in order to strengthen the skills that each employee needs to improve. During the year, Logicom has been accredited as an ACCA (Association of Chartered Certified Accountants) approved employer to ensure that its certified employees will maintain and enhance the knowledge and skills needed to deliver a professional service.



What we achieved up to 2021

- ✔ Grievance mechanism completed and communicated.
- ✔ Anti-bribery and Corruption Policy Acknowledgment and e-learning training for all employees.
- ✔ Education of employees on company's Code of Business Conduct .
- ✔ Education of employees on US/UN/EU Sanctions and Export Control Compliance Policy, Competition Law Compliance Policy, and Data Privacy and Protection Policies.
- ✔ Disclosure (Whistle-blowing) Policy was established and communicated to encourage the employees to report suspected misconduct or illegal acts.



Where are we headed:

Note:



Goals in progress



Goals completed



Goals planned

Short-term goals:

- ✔ Introduce a procedure to review Group's Policies and Procedures.

Mid-term goals:

- ✔ Introduce a volunteering plan for employees to encourage charity work and urge on our employee's enthusiasm to do good for society.

Long-term goals:

- ✔ Training hours: Increase the training hours per employee with emphasis on developmental training.
- ✔ Improvement of health and safety monitoring procedures.

CSR STRATEGY AND ROADMAP



HUMAN RIGHTS

Human rights are the basic rights to which all human beings are entitled. There are two broad categories of human rights. The first category concerns civil and political rights and includes such rights as the right to life and liberty, equality before the law, and freedom of expression. The second category concerns economic, social, and cultural rights, and includes such rights as the right to work, the right to food, the right to the highest attainable standard of health, the right to education, and the right to social security.

An organisation has numerous opportunities to support human rights among its own operations and employees, as well as opportunities to work with its suppliers, peers, or other organisations and the broader society, to promote human rights. An organisation has the responsibility to respect, protect, and fulfil human rights, including within its sphere of influence. To respect human rights, organisations have a responsibility to exercise due diligence to identify, prevent, and address actual or potential human rights impacts resulting from their activities or the activities of those with which they have relationships.

Logicom has the utmost respect for Human Rights and all other policies and procedures are developed on this basis.

WHERE WE STAND:

DUE DILIGENCE, AVOIDANCE OF COMPLICITY, ECONOMIC SOCIAL AND CULTURAL RIGHTS, HUMAN RIGHTS RISK SITUATIONS

The Group has implemented a **Human Rights Policy** that gives guidance to its employees and closely linked stakeholders. This policy formalises Logicom's long-standing commitment to uphold and respect human rights for all people, and it sets the grounds for Logicom to identify and address any existing misconduct or potential misconduct towards human rights.

Prior to engaging in a business relationship with a prospective supplier or subcontractor, Logicom's Management ensures that these are screened based on numerous criteria. These include:

- Supplier's or subcontractors' company profile (in terms of reputation, market position, and share).
- Brand name (in terms of quality).
- Impacts to the Group profile in the case of choosing to do business with the supplier/subcontractor, negative or positive.
- Environmental criteria (materials used in production and packaging, recycling, use of renewable sources of energy, compliance with the ROHS Directive).
- Anti-bribery and corruption criteria.

All the contracts signed between the Group and its major distribution and services suppliers are based on the supplier's terms and conditions. Our major suppliers are international organisations of great reputation, well known for their Social Responsibility practices. All the contracts signed and accepted by Logicom include clauses for Environmental Compliance, Corruption and Anti-piracy, and Customer Data Privacy.

In the same way, Logicom declares its compliance to Anti-Money Laundering Laws, Anti-Corruption and International Labour Laws in regard to child labour and forced labour when signing public tenders.

The contracts signed between Logicom and cloud marketplace suppliers are mostly initiated by Logicom and signed by the supplier. The contracts contain compliance clauses regarding Anti-trust, anti-corruption laws, laws of the International Labour Organisation for child labour, and clauses prohibiting connections to terrorists and criminal organisations.

To the best of our knowledge, none of Logicom's suppliers was identified as having significant negative impacts on the society and the environment, nor as having significant risk for incidents of child labour, forced or compulsory labour, and human rights abuses.

All the new supplier contracts signed in 2021 were screened according to the procedures as mentioned above. No significant or potential negative environmental impact was identified in the supply chain. Criteria for impact on society, human rights, and labour practices were not part of the screening procedure as specific areas, however, they are taken into consideration when determining the supplier's company profile.

There were no significant investment agreements and contracts in the year that underwent human rights screening. An investment is considered to be significant if it exceeds 5% of Logicom's Total Assets, or if approval is required at a BOD level due to its strategic importance.

FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK, CIVIL AND POLITICAL RIGHTS, DISCRIMINATION AND VULNERABLE GROUPS, RESOLVING GRIEVANCES

Following the completion of the Human Rights Policy, a due diligence examination on Human Rights impacts will be conducted to track Logicom's performance across its areas of operation.

Logicom's workforce currently does not include any indigenous people.



Focus Areas:

To undertake human rights **due diligence** to proactively identify and assess **human rights risks situation**, and prevent and address actual or potential human rights impacts resulting from the organisations' activities or the activities of those with which they have relationships.

Integrating the common features of legal and societal benchmarks into its due diligence processes to become aware of, prevent, and address risks of **complicity**.

The **training** of our people on the Global Human Rights Policy and subsequent checks on its implementation and application of corrective actions is set where necessary.

What we achieved up to 2021

-  The Human Rights Policy has been completed and released.
-  Human Rights Due Diligence is in progress for two main operations of the Group, in the regions of Europe and Middle East.

Where are we headed :

Note:



Goals in progress




Goals Completed




Goals planned

Mid-term goals:

-  Employee training on Logicom's Human Rights Policy and procedures.

Long-term goals:

-  Due diligence examination on Human rights impacts.



CSR STRATEGY AND ROADMAP



FAIR OPERATING PRACTICES

Fair operating practices concern ethical conduct in an organisation's dealings with other organisations.

Behaving ethically is fundamental to establishing and sustaining legitimate and productive relationships between organisations. Therefore, observance, promotion, and encouragement of standards of ethical behaviour underlie all fair operating practices.

More specifically, in the area of social responsibility, fair operating practices concern the way an organisation uses its relationships with other organisations to promote positive outcomes. Positive outcomes can be achieved by providing leadership and promoting the adoption of social responsibility more broadly throughout the organisation's sphere of influence.

Logicom conducts its business with integrity and care. It believes that integrity, fair dealing, and good business practices are essential assets of the Group, and this should be reflected in all its activities.

Logicom's Code of Business Conduct, which is an integral part of the Group's culture, mentions explicitly that the Group has full commitment for zero tolerance to bribery and corruption, operating in compliance with competition laws, complying with trade sanctions, and US, UN and EU export regulations and for protecting personal data and applicable laws.

WHERE WE STAND:

For the current year, the Company examines its performance on two issues of interest: Anti-Corruption and Fair Competition. As discussed in the evaluation of performance (page 33-35), the analysis of the stakeholders' views at the detailed level of issues of interest, revealed that, even though the core subject of Fair Operating Practices is not among the top three, the issues of Anti-Corruption and Fair Competition that fall under this core subject are of high relevance and significance to both internal and external stakeholders. The Company intends to examine its performance on the remaining of the issues of interest (Figure 9, page 34) in future reports.

ANTI-CORRUPTION

Logicom has developed and implemented an Anti-Bribery Management System that fully complies with the requirements of the [ISO 37001:2016](#) Anti-Bribery and Corruption Management Systems Standard.

Logicom's **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 it operates.

The Group's staff receives regular training on the 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.

Stakeholders and other third parties with whom the Group may transact 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 Corruption compliance programme in place. Logicom reserves the right to terminate its contractual relationship with stakeholders and other third 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.

Business partners onboarding:

All prospective customers, vendors and business associates are assessed as to whether they meet Logicom's on boarding requirements.

- Total number and percentage of operations assessed for risks related to corruption:

Logicom Public Ltd has undergone an Anti-Bribery and Corruption Risk Assessment for all its operations in Cyprus (100%). Risks related to corruption were identified and assessed.

- Significant risks related to corruption identified through the risk assessment:

Total percentage of operations identified with corruption- related risks: 45.5%.

Indicatively, the analysis of risks identified by department is as follows:

Management (47%),
Sales (33%),
Purchasing (10%),
Accounts (5%), and
Human Resources (5%).



- Total number and percentage of governance body members that the organisation's anti-corruption policies and procedures have been communicated to, broken down by region (*GRI 205-2 a*):
100% to all governance body members.

Governance body members include the Board of Directors, the Executive Management Committee, and the Anti-bribery and Corruption Compliance teams based in Europe and Middle East.

- Total number and percentage of employees that the organisation's anti-corruption policies and procedures have been communicated to, broken down by employee category and region:
100% to all employees of the Group in all departments in Europe and Middle East regions.

- Total number and percentage of business partners that the organisation's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organisation's anti-corruption policies and procedures have been communicated to any other persons or organisations:

The Anti-Bribery and Corruption Policy Statement was communicated to all active customers of the Group. The % of active customers that accepted the policy and were successfully on-boarded was: 36%.

The Anti-Bribery and Corruption Policy Statement was also communicated to all Business Associates ("BA's") in Cyprus except for those rated with low bribery risk. Such BAs are suppliers/ subcontractors for non-resale products/services (e.g., travelling agencies, hotels, couriers.). The % of BA's that accepted the policy and were successfully on-boarded was: 100%.

- Total number and percentage of governance body members that have received training on anti-corruption, broken down by region:
100% of governance body members.

Governance body members include the Board of Directors, the Executive Management Committee, and the Anti-bribery and Corruption Compliance team, based in Europe and Middle East.

- Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region :
100% of the Group employees in all departments in Europe and Middle East regions.

More specifically, the training covered:

US/UN/EU Sanctions and Export Control Compliance Policy

Logicom's Exports Controls and Sanctions

Logicom's Code of Business Conduct

Logicom's Competition Compliance Policy

Anti-Bribery and Corruption Policy

Compliance Trainings (Sales Teams)



- Total number of confirmed incidents of corruption: **Zero**
- Total number of confirmed incidents in which employees were dismissed or disciplined for corruption: **Zero**
- Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption: **Zero**
- Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases: **Zero**

FAIR COMPETITION

Logicom is committed to ensuring that integrity, fair dealing, and ethical business practices are reflected through all of its business activities and relationships globally.

Logicom cautions all employees, wherever they are located, that all discussions held at meetings or events with Competitors must be conducted in strict compliance to all applicable local Anti-trust or Competition Laws and in accordance with the Company's Competition Law Compliance Policy. The policy procedures define the internal reporting obligations for any kind of communication with competitors, the rules of communication with competitors, and support to ensure completeness in planning and keeping records of meetings with competitors or summarising meetings that took place by coincidence.

- Number of legal actions pending or completed during the reporting period regarding anti-competitive behaviour and violations of anti-trust and monopoly legislation in which the organisation has been identified as a participant: **None**
- Main outcomes of completed legal actions, including any decisions or judgments: **N/A**

Raising concerns:

Logicom is committed to the highest standards of openness, transparency, integrity and, accountability. The Company uses an array of tools to deter, encourage, and facilitate the reporting of any bribery and/or corruptions attempts.

Focus Areas:

The Group has an impeccable anti-corruption record, which is critical to its operations, because any implication that the company is engaged in corruption could lead to legal consequences, financial damages and a tarnished reputation.

While the Group has demonstrated significant inclusion of social and environmental procurement criteria for its suppliers or sub-contractors, an additional practice to consider is the use of sustainability ratings that would provide additional screening depth and third-party accreditation for its suppliers' and business associates' compliance.

Where are we headed:

Note:



Goals in progress




Goals Completed




Goals planned


Short-term goals:

-  Assess the Group's performance on the issue of interests of responsible political involvement, promoting social responsibility in the value chain, and respect for property rights.

Mid-term goals:

-  Achieve communication of the Anti-bribery and Corruption Policy Statement to all customers, vendors, and business associates.

Long-term goals:

-  Inclusion of social and environmental procurement criteria for suppliers and businesses associates.



CSR STRATEGY AND ROADMAP



CONSUMER ISSUES

Organisations that provide products and services to consumers, as well as other customers, have responsibilities to those consumers. These responsibilities include:

- Providing education and accurate information to our consumers using fair, transparent, and helpful marketing information and contractual processes;
- Promoting sustainable consumption; and
- Designing solutions that provide access to all and cater, where appropriate, for the vulnerable and disadvantaged.

Logicom does not deal with consumers directly.

The term 'consumer' refers to those individuals or groups that make use of the output of the organisations' decisions and activities and does not only refer to consumers who pay money to purchase products and services. Company responsibilities to their consumers also involve minimising risks from the use of products and services, through design, manufacture distribution, information provision, support services and withdrawal and recall procedures. Many organisations also collect or handle personal information and have a responsibility to protect the security of such information and the privacy of consumers.

Logicom has very strong adherence standards to all regulations that are applicable to its industry and ensures the risk emanating on this front is managed effectively and proactively.

Logicom is partnering in the success of its customers by delivering its services with quality, responsibility, and care to ensure customer satisfaction.

WHERE WE STAND:

CONSUMER SERVICE, SUPPORT AND COMPLAINT AND DISPUTE RESOLUTION

■ Customer satisfaction surveys:

Services sector companies: Surveys are run every year to measure the call satisfaction, yearly customer satisfaction, and the level of meeting the customers' needs and expectations. 2021 results are presented in figure 21 below.

KEY PERFORMANCE INDICATORS (KPIs)

- Yearly Total Performance, KPI: **4,09/5**
- Business Consulting Services: **4,5/5**
- Business Solution and Software: **4/5**
- Project Management: **4,61/5**
- Meet customer needs and expectations: **92%**
- Average call customer satisfaction survey: **4,78/5**



▲ **Figure 21:** Customer satisfaction surveys results for Services (2021)

Distribution sector companies:

Customer feedback is obtained through regular customers visits and through the preparation of 'lost business' analysis, which analyses the customers with 10% decrease compared to the previous year. This analysis aims to understand the reasons for the loss of business for each individual customer, identify patterns and provide the sales team with information so that it may tailor its strategy and operation model towards that customer, customer group, or the entire customer base.

Due to the restrictions imposed by the pandemic during the year, the visits to the customers could not take place and they were limited to brief web-based conversations. The gaps that were caused by these unforeseen interruptions to the business, will be bridged in 222.

To improve customers satisfaction and be able to better serve their needs, the Group is currently designing a new process, one that will be built into the e-commerce platform, to gather customers' valuable insights as to how they perceive Logicom as their business partner.

■ **Customer complaints:**

In 2021, 7 customer complaints were recorded, all from EU region customers. All complaints were reviewed, investigated, and resolved.

CONSUMER DATA PROTECTION AND PRIVACY

Providing our customers with truthful and accurate information has always been a way for Logicom to gain trust and credibility, as well as differentiation in the market. Logicom has taken all necessary measures to ensure the timely implementation of the requirements of the **General Data Protection Regulation** (GDPR). In 2018, Logicom introduced and implemented the Logicom Data Privacy Policy.

■ *Customer complaints:*

Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data:

No complaints were received for loss of customer data or breaches of privacy.

FAIR MARKETING, FACTUAL AND UNBIASED INFORMATION AND FAIR CONTRACTUAL PRACTICES, PROTECTING CONSUMERS HEALTH AND SAFETY

■ Requirements for product and service health and safety impacts, information, and labeling lay with our vendors. However, Logicom, during the process of vendors' screening, assesses the existence of adequate information about the impacts of products, which includes information on the safe use of the product, its disposal, and sourcing of its components.

■ Compliance: Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.

Logicom had **zero** fines for non-compliance, and no claims were raised against it regarding incidents of health and safety impacts of products and services, the provision of products and services, or marketing communications.

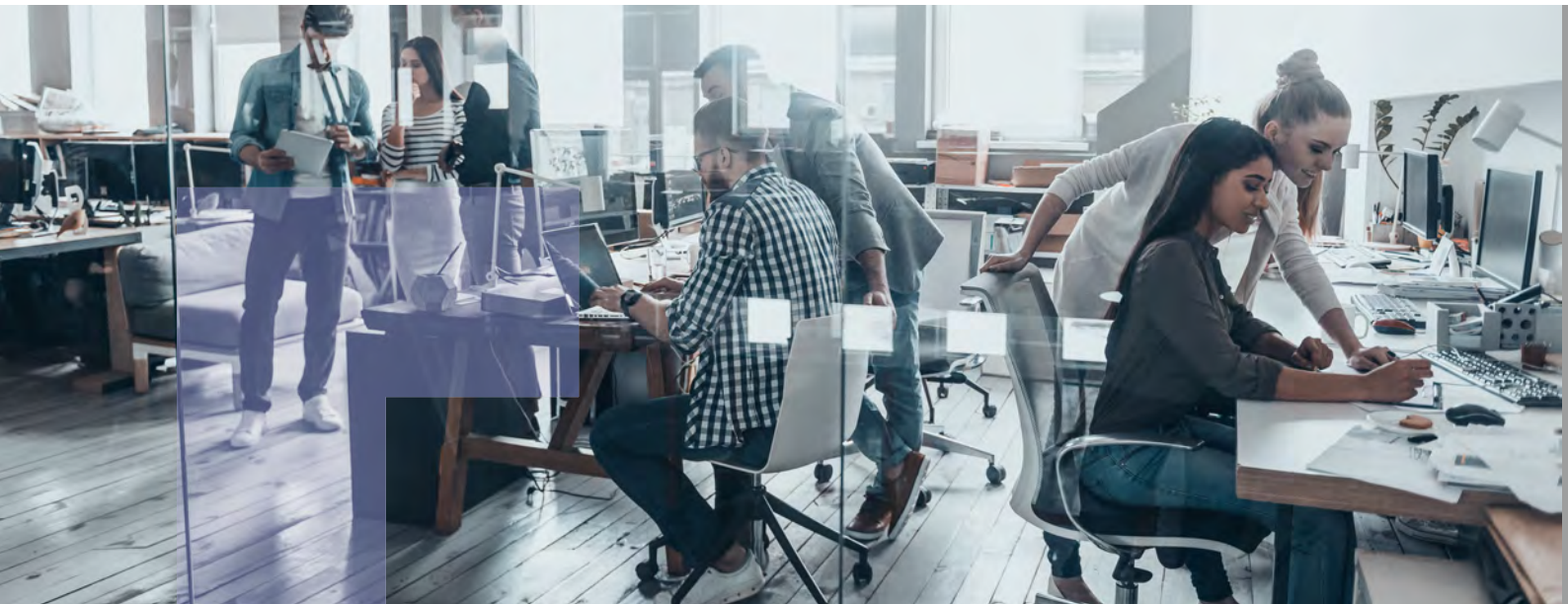
SUSTAINABLE CONSUMPTION

■ Energy consumption: The Logicom companies located in Cyprus measure their premises and warehouses energy consumption as part of their adherence to the environmental ISO. The rest of the Group companies are also measuring their premises and warehouses energy consumption and effort is made to take all measures that will enable energy savings across Logicom's areas of operations. The energy consumption differs from country to country due to various conditions like climate, number of personnel, IT equipment in the company, the energy efficiency of the building, and so on.

Focus Areas:

The issues of **Fair marketing, Factual and unbiased information and fair contractual practices, Protecting consumers' health and safety, Consumer service, support, and complaint and dispute resolution, Access to essential services, Education and awareness** are examined regularly. Logicom has a very strong culture in adhering to all regulations and standards that are applicable to its industry and is ensuring the risk emanating on this front is managed effectively and proactively.

Logicom is developing a strategy for promoting **sustainable consumption** and the need to optimise energy use in its commercial and public facilities.



What we achieved up to 2021

- ✔ Customer satisfaction surveys for the Services sector are being ran every year and their results are evaluated.
- ✔ Customer satisfaction survey for Logicom Distribution was performed in 2019 and the results were presented.
- ✔ Existing communication lines evolved to enable the direct and centralised recording and processing of customer complaints. A communication line was established through the Group's official website and the e-commerce platform.

Where are we headed:

Note:



Goals in progress



Goals completed



Goals planned

Mid-term goals:

- ✔ Completion of an Energy audit of all Cyprus' based companies, premises, and fleet.
- ✔ Optimisation of energy use in commercial and public facilities of the Group, such as our premises and warehouses.
- ✔ Customer satisfaction assessment through e-commerce platform for Distribution customers, on an ad hoc basis.

Long-term goals:

- ✔ Sustainable consumption: Promote sustainable consumption through our customer channel.



CONTRIBUTING TO THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS WITH ISO 26000

The 17 United Nations Sustainable Development Goals (UN SDGs) and their 169 targets were adopted in 2015.

The SDGs are a set of aspirational goals to end poverty and other deprivations, protect the planet, improve health and education, reduce inequality, spur the economic growth, and ensure prosperity for all as part of the United Nations 2030 Agenda for Sustainable Development.



As stated early on in this report, Logicom has used the ISO26000 framework for producing the report. Concurrently, Logicom recognised the importance of SDGs and presents in this report the alignment between the actions we have made and the SDGs. Currently aligning with 7 of them, our ultimate goal is to eventually align with all 17 SDGs. **Below we demonstrate how Logicom contributes to the SDGs:**

CONTRIBUTING TO THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS WITH ISO 26000

ORGANISATIONAL GOVERNANCE and UN SDGS



Logicom’s efforts in promoting and achieving gender equality are reflected in our constantly improving gender ratios across both managerial and non-managerial positions. Currently, managerial personnel composition is 78% - male and 22% - female, compared to the base year’s 82% - male and 18% - female. What is more, composition of women’s presence in the primary activity departments increased by 1% compared to the base year.



Logicom is a large sized organisation providing jobs to an increasing number of people with 813 currently being employed across Europe and the Middle East. Company policies in place, including a formal written Code of Business Conduct and an Ethics and Compliance manual and a unified Human Rights policy, set the standards of business conduct for all its employees and business partners in all countries of operation.



In addition to reducing gender inequality, numerous criteria are set in place for achieving as much diversity as possible within the Board of Directors, while ensuring the availability of suitable candidates is always accounted for.

More details on Logicom’s CSR efforts in this area can be viewed in section “CSR Strategy and road map”, core subject “Organisational Governance”, pages 36-48 of this report.

LABOUR PRACTICES and UN SDGS



Logicom provides fair compensation, addresses employees concerns, and ensures health and safety in the workplace. Health and safety procedures and guidelines are practiced extensively, reviewed on a regular basis, and monitored by Management to ensure that risks in the workplace are minimised.



Providing employees with opportunities to improve their skills and ensure professional development through training and continuous education is a priority for Logicom. Employees developmental plan is mutually agreed between employees and their line manager through the annual performance appraisal of employees.

CONTRIBUTING TO THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS WITH ISO 26000

LABOUR PRACTICES and UN SDGS



The gradual decrease of the gender inequality gap is evident in many aspects of Logicom’s labour practices.



Logicom makes sure its recruitment practices align with its priority to contribute to economic growth by prioritising the local community for positions at all levels. Currently, 66% of total senior management are locals and 34% are foreigners, demonstrating an improvement from the base year’s ratio of 64% local and 36% foreigners.



Logicom takes the necessary actions to promote diversity and inclusion at all levels and equal opportunities in the workplace, as governed by its Equality and Diversity policy. It benefits from a diverse workforce of more than 30 nationalities and of which 0.37% is taken up by employees with physical disabilities.

More details on Logicom’s CSR efforts in this area can be viewed in section “CSR Strategy and roadmap”, core subject “Labour practices”, pages 49-58 of this report.

HUMAN RIGHTS and UN SDGS



Implementing human rights internally and screening services and distribution suppliers on human rights criteria creates a positive social impact and provides support to local communities’ needs and standard of living. Additionally, frameworks in place act as tools to prevent discrimination and safeguard equality among the workforce.



Logicom released its global Human Rights Policy and the training on Human Rights, while the due diligence examination on Human Rights impacts is imminent. Efforts towards improving social responsibility in the supply chain include screening suppliers to ensure social and environmental compliance, fair working conditions, fair compensation, and respect for human rights.

More details on Logicom’s CSR efforts in this area can be viewed in section “CSR Strategy and roadmap”, core subject “Human rights”, pages 59-61 of this report

CONTRIBUTING TO THE UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS WITH ISO 26000

CONSUMER ISSUES and UN SDGS



Logicom practices responsible interaction with its customers and promotes sustainable consumption through utilisation of its customers channel, customer satisfaction surveys, a customer complaint management system, and the timely implementation of the requirements of the General Data Protection Regulation (GDPR).

More details on Logicom's CSR efforts in this area can be viewed in section "CSR Strategy and roadmap", core subject "Consumer issues", pages 67-71 of this report

FAIR OPERATING PRACTICES and UN SDGS



Ethical conduct in the organisation's dealings with other organisations is fundamental to establishing and sustaining a legitimate and productive relationship.

Logicom's Code of Business Conduct and Anti-bribery and Corruption Statement Policy mentions explicitly that the Group is fully committed to zero tolerance to bribery and corruption, operating in compliance with competition laws, complying with trade sanctions and US/UN/EU export regulations, and protecting personal data and applicable laws. Logicom has developed and implements an Anti-Bribery Management System that fully complies with the requirements of the ISO37001:2016 Anti-Bribery and Corruption Management Systems.

More details on Logicom's CSR efforts in this area can be viewed in section "CSR Strategy and roadmap", core subject "Fair operating practices", pages 62-66 of this report



DATA APPENDIX

ORGANISATIONAL GOVERNANCE

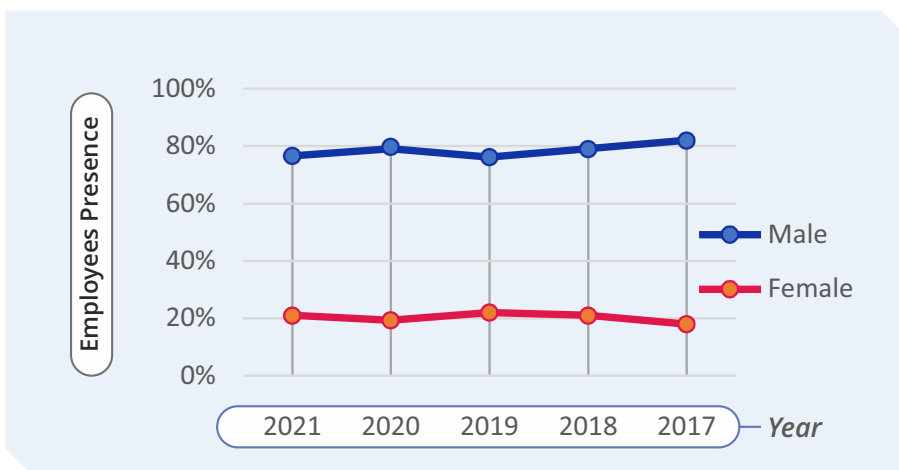
DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES

1. BOARD OF DIRECTORS

	2021	2020	2017
Age groups	Male	Male	Male
<30	-	-	-
30-50	-	-	43%
>50	100%	100%	57%

2. MANAGEMENT PERSONNEL

Age groups	2021		2020		2017	
	Male	Female	Male	Female	Male	Female
<30	0%	0%	0%	0%	100%	0%
30-50	74%	26%	76%	24%	80%	20%
>50	88%	12%	89%	11%	93%	7%
Total	78%	22%	79%	21%	82%	18%



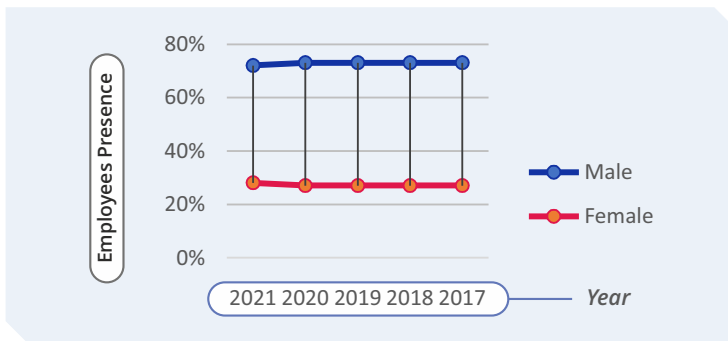
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ORGANISATIONAL GOVERNANCE

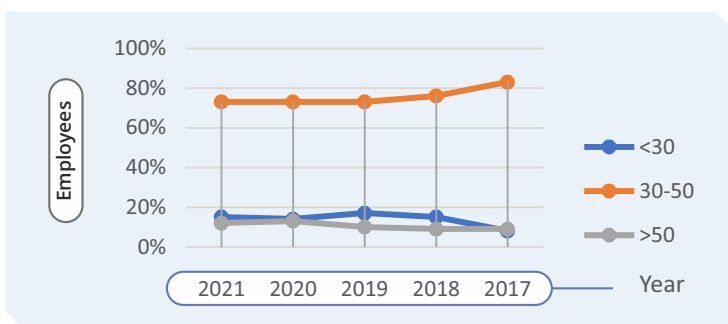
DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES

3. EMPLOYEES

by Region	2021			2020			2020		
	Male	Female	Total by region	Male	Female	Total by region	Male	Female	Total by region
EU	64%	36%	53%	67%	33%	57%	66%	34%	54%
ME	81%	19%	47%	80%	20%	43%	81%	19%	46%
Total by gender	72%	28%		73%	27%		73%	27%	



by Age Groups	2021			2020			2020		
	Male	Female	Total by age group	Male	Female	Total by age group	Male	Female	Total by age group
<30	69%	31%	15%	66%	34%	14%	68%	32%	8%
30-50	72%	28%	73%	73%	27%	73%	74%	26%	83%
>50	75%	25%	12%	78%	22%	13%	67%	33%	89%



DATA APPENDIX

ORGANISATIONAL GOVERNANCE

DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES

by Department Category	2021			2020			2020		
	Male	Female	Total by Department Category	Male	Female	Total by Department Category	Male	Female	Total by Department Category
Primary	76%	24%	80%	76%	24%	80%	77%	23%	80%
Support	56%	44%	20%	59%	41%	20%	55%	45%	20%

Permanent Contract	2021			2020			2020		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Full Time	72%	28%	100%	73%	27%	100%	73%	27%	99.6%
Part Time	0%	0%	0%	0%	0%	0%	50%	50%	0.4%

By contract	2021	2020	2017
Permanent	99,5%	99%	98%
Fixed term	0,5%	1%	2%

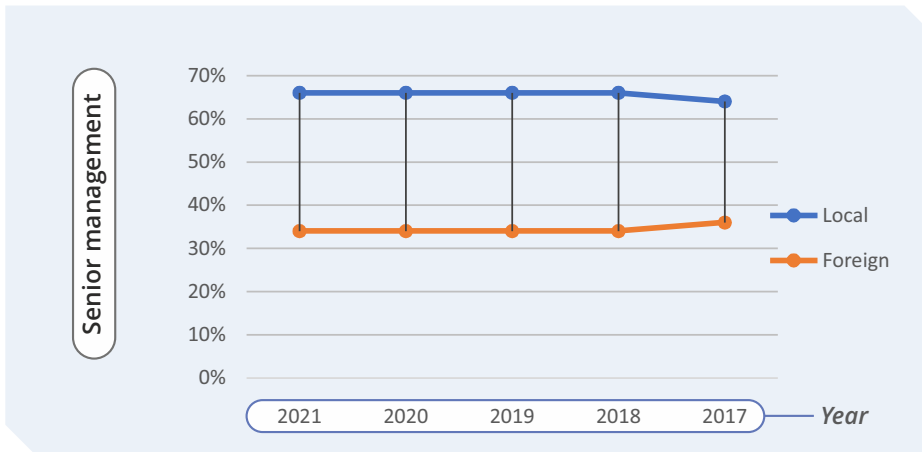
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LABOUR PRACTICES

EMPLOYMENT AND EMPLOYMENT RELATIONSHIPS

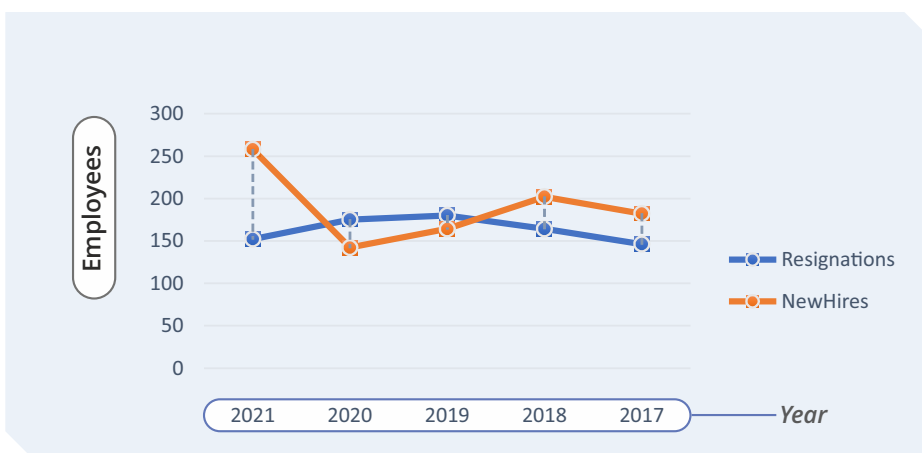
1. PORTION OF THE SENIOR MANAGEMENT HIRED FROM THE LOCAL COMMUNITY

2021	2020	2017
66%	66%	64%



2. RATIO OF RESIGNATIONS TO NEW HIRES

2021	2020	2017
1: 1,70	1: 0,81	1: 1,25



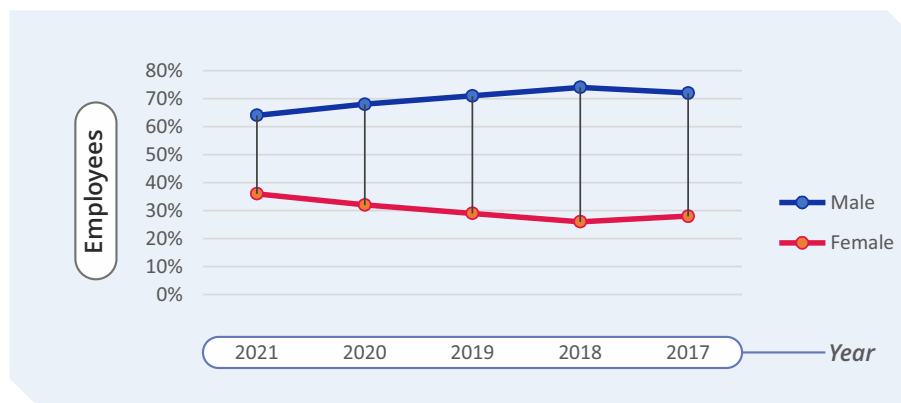
DATA APPENDIX

LABOUR PRACTICES

EMPLOYMENT AND EMPLOYMENT RELATIONSHIPS

3. NEW HIRES BY REGION AND GENDER

Region	2021			2020			2017		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
EU	50%	50%	55%	67%	33%	55%	69%	31%	61%
ME	73%	27%	45%	70%	30%	45%	72%	28%	39%
Total	64%	36%		68%	32%		72%	28%	



4. TURNOVER RATE

2021	2020	2017
23%	23%	21%

5. TURNOVER BY GENDER AND REGION

Region	2021			2019			2017		
	Male	Female	Total by region	Male	Female	Total by region	Male	Female	Total by region
EU	57%	43%	48%	66%	34%	40%	64%	36%	58%
ME	65%	35%	52%	72%	28%	60%	74%	26%	42%
Total by gender	61%	9%		70%	30%		69%	31%	

DATA APPENDIX

LABOUR PRACTICES

EMPLOYMENT AND EMPLOYMENT RELATIONSHIPS

6. TURNOVER BY AGE

	2021	2020	2017
Age groups			
<30	23%	27%	13%
30-50	70%	63%	84%
>50	7%	9%	3%

7. ENTRY LEVEL RATIO IN SIGNIFICANT OPERATIONS

Country	2021	2021	2021
Cyprus	1,03: 1	1,03: 1	n/a
Greece	1,21: 1	1,20: 1	n/a
UAE	1: 1	1: 1	n/a
KSA	1,67: 1	1,67: 1	n/a

8. RETURN TO WORK RATE AND RETENTION RATE

	2021	2020	2017
Return to work	97%	93%	n/a
Retention	71%	71%	n/a

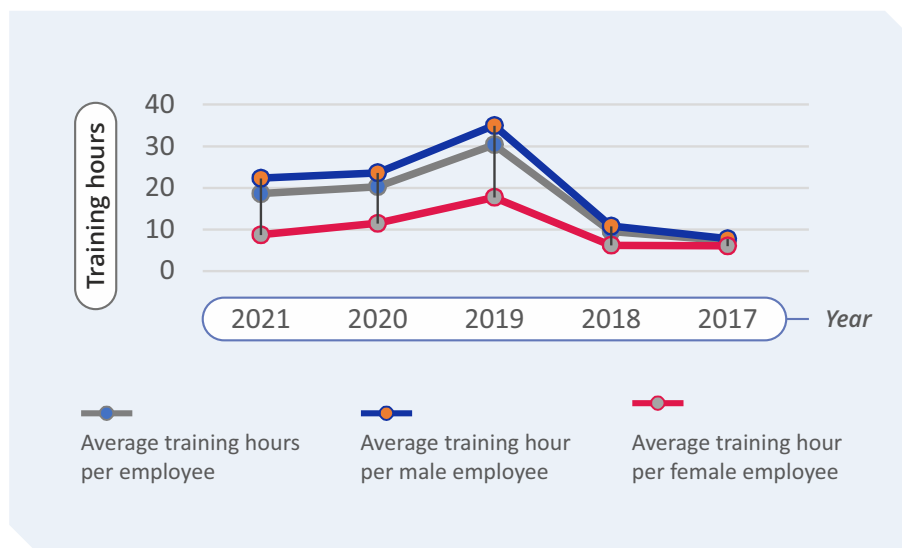
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LABOUR PRACTICES

EMPLOYMENT AND EMPLOYMENT RELATIONSHIPS

9. TRAINING HOURS

	2021	2020	2017
Average training hours per employee	18,56	20,24	7,27
Average training hour per male employee	22,30	23,55	7,74
Average training hour per female employee	8,68	11,42	6,03



10. HEALTH AND SAFETY ACCIDENTS RECORDED

	2021	2020	2017
Average training hours per employee	18,56	20,24	7,27
Average training hour per male employee	22,30	23,55	7,74
Average training hour per female employee	8,68	11,42	6,03

DATA APPENDIX

CONSUMER ISSUES

SERVICES SECTOR CUSTOMER SATISFACTION

	2021	2020	2017
Yearly total performance KPI	4,09/5	4,55/5	4,9/5
Meet customer needs and expectations obj:85%	92%	90,3%	n/a
Business consulting services	4,5/5	4,7/5	n/a
Technology solutions and services projects	4,61/5	4,9/5	4,9/5
Business solutions and services projects	4/5	4,9/5	4,7/5

OTHER DATA

a. CO2 Emissions

	2021	2020	2017	+/- change
CO2 emissions in metric tones	60,5	59,6	n/a	+1,5%

b. Energy and water indicators

	2021	2020	2017	+/- change from prior year
Kw/h per employee	2.211	2.473	n/a	-10,59%
% of L/100k sales	24,39	21,09	n/a	+15,65%

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*OBLIGATION UNDER CYPRUS COMPANIES LAW CAP.113

This report is published pursuant to Section 151(A) (9b) of the Cyprus Companies Law Cap.113.
"This report has been provided to the Company's Statutory Auditors".

DISCLAIMER

The purpose of this consolidated corporate social responsibility report (the “report”) is solely and exclusively limited to the Company’s and the Group’s compliance with the provisions of section 151B of the Companies Law Cap. 113.

This report does not and should not, under any circumstances, be considered or taken to constitute an **investment, financial, tax, legal, regulatory or other advice**. Therefore, any reader of this report is strongly encouraged to seek independent expert advice in relation to any matters arising hereunder.

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