

Code of Business Conduct and Ethics

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1. Introduction

Since its foundation “**INTRACOM DEFENSE S.A.**”, with the distinctive title “**IDE**” (hereinafter called “**IDE**” or “**the Company**”), has governed its business practices with integrity, honesty, fair dealing and full compliance with all applicable laws. IDE is also committed to the implementation of these values and Corporate Business Principles in every area in which it operates.

This Code of Business Conduct and Ethics (Code) specifies and helps the continued implementation of the Corporate Business Principles by establishing certain non-negotiable minimum standards of behaviour in key areas.

This Code applies to all employees, directors, officers, and contractors of IDE and it should also be provided to and followed by the Company’s agents and representatives. The Code sets forth the standards for the way IDE conducts business ethically around the world. These ethical business standards include dealing with Company’s employees, its customers, contractors, partners and shareholders, communities and governments.

This Code covers a wide range of business practices and procedures. The nature of this Code is not meant to cover all possible situations that may occur. It has been drafted in such a way as to provide a reference framework in which any activity can be integrated and evaluated. Employees and officers should seek guidance when they are in doubt about the proper course of action in a given situation and should seek to avoid the slightest indication of inappropriate behavior, as it is fundamental responsibility of each employee to “do the right thing”, a responsibility that cannot be delegated.

Those who violate the standards in this Code will be subject to disciplinary action, including possible dismissal. In addition, violations of the Code may also constitute violations of the law that result in civil and criminal penalties for the responsible employees, executives and directors and / or the Company.

If there is a situation that an employee believes it may violate or lead to a violation of this Code, he or she must follow the procedures set out in Sections 22 and 24 of this Code.

The Company is also committed to the balanced achievement of profitability and sustainable growth. Furthermore, the Company actively contributes to the promotion of the concept of corporate social responsibility to the Greek business community.

The Company is fully aligned with the U.N. Global Compact’s ten principles in the areas of human rights, labour, environment and anti-corruption.

For the purposes of this Code, references to “employees” include employees, workers, associates, officers and directors of IDE.

The underlying policies provide more detailed information about each of the subjects in the Code:

2. Compliance with Laws, Rules and Regulations

IDE operates in many markets and countries throughout the world. In all instances, we respect national laws and any other laws and standards with an international reach, such as the 1997 OECD Convention and the United Nations Convention Against Corruption (UNCAC), the European Anti-Corruption Conventions, the UK Bribery Act, the Greek Anti-Corruption legislation, the U.S. Foreign Corrupt Practices Act and the European Common Industry Standards and the relevant industry codes of conduct.

Obedying the law, both in letter and in spirit, is the foundation on which this Company's ethical standards are built. All IDE's employees must respect and obey the laws, rules and regulations of the cities, states and countries in which IDE operates. Although employees are not expected to know the details of each one of these laws, rules and regulations, it is important to know enough to determine when to seek advice from their supervisors, managers or other appropriate personnel. Employees and officers are required to act ethically in all aspects of their business and must maintain high standards of honesty, reliability and integrity.

Additionally, employees shall adhere to internal rules and regulations as they apply in a given situation. Those internal rules are specific to the Company and may impose stricter requirements than the ones required by law and are included in the Employees' Handbook which has been approved by the Greek public authorities.

3. Conflicts of Interest

A "conflict of interest" exists when a person's private interest interferes in any way - or even appears to interfere - with the interests of the Company. A conflict situation can arise when an employee or officer takes actions or has interests which make it difficult both for his objective judgment and the effective performance of his duties. Conflicts of interest may also arise when an employee or officer, or a member of his or her family or a close associate of him or her receives improper personal benefits by the Company as a result of his or her position in the Company. Loans to, or guarantees in favour of employees and officers and their family members or close associates may create conflicts of interest and in certain instances are prohibited by law.

A Company employee is not permitted to offer his work to a competitor, customer or supplier at the same time, and must avoid any direct or indirect business relationship and transaction with the Company's customers, suppliers or competitors beyond what is required to fulfill the duties it has undertaken for Company's benefit.

Conflicts of interest are prohibited as a matter of Company policy, except as approved by the Board of Directors. The Company requires that employees disclose any situations that would reasonably be expected to give rise to a conflict of interest. Conflicts of interest may not always be clear-cut. Any employee or officer who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate personnel or consult the procedures provided in Sections 22 and 24 of this Code to resolve the situation in a fair and transparent manner.

4. Insider Trading

All non-public information about the Company, Major Shareholders Group, Company's customers or Business Partners (called "inside information") should be considered confidential information. Employees and officers who have access to confidential information about the Company or any other entity are not permitted to use or share that information for trading purposes in INTRACOM's or the other entity's securities or for any other purpose except the conduct of the Company's business. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal. Similarly, sharing inside information with a friend, relative or business associate is strictly prohibited unless that person is specifically authorized to receive the information (e.g., an outsource associate who has signed an appropriate non-disclosure agreement and has a business-related need to know).

5. Corporate Opportunities- Inventions

Employees are prohibited from taking advantage of opportunities arising in the course of their duties while through the use of the property, information they are acquainted with or the position they hold without the consent of the Board of Directors. No employee or officer may use corporate property, information, or position for personal benefit, and no employee or officer may compete with the Company directly or indirectly. Employees and officers have a duty to the Company to promote the Company's interests when the opportunity to do so arises.

Employee inventions may qualify as Company property. To the extent that the invention or improvement of a product or a process is directly or indirectly related to Company's business, it is considered to be the Company's property, regardless of whether the invention or improvement was made or conceived during working hours.

6. Competition and Fair Dealing

IDE seeks to outperform its competition fairly and honestly. IDE seeks competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret

information that was obtained without the owner's consent, or inducing such disclosures by former or active employees of other companies is prohibited. Each employee should endeavour to respect the rights of and deal fairly with the Company's customers, suppliers, competitors and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other illegal trade practice.

No employee or officer is permitted to engage in price fixing, bid rigging, allocation of markets or customers, or similar illegal or unethical practice that hinders competition.

In order to preserve the company's reputation, compliance with quality procedures and safety requirements is particularly important and the handling of all certificates and inspection and testing documents has to be in line with the specifications and requirements set by current legislation.

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers. No gift or entertainment should ever be offered, given, provided or accepted by any Company employee, family member of an employee or associate, or agent unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is reasonable in value, (4) cannot be construed as a bribe or payoff and (5) does not violate any laws, regulations or applicable policies of the other party's organization. Additionally, all gifts and entertainment expenses should be properly accounted for on expense reports. It is responsibility of each employee to use good judgment in this area. When in doubt, the employee shall seek guidance from his or her Line Manager, the Legal and the HR Section.

7. Bribery and Corruption

IDE condemns any form of bribery and corruption.

Employees must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantage in order to obtain or retain a business or other advantage from a third party, natural or legal person, whether public or private. Nor must they accept any such advantage in return for any preferential treatment of a third party.

Moreover, employees must refrain from any activity or behaviour that could give rise to the appearance or suspicion of such conduct or the attempt thereof.

The promise, offer or delivery to an official or employee of the Greek and/or any foreign government of a gift, favour or other gratuity in violation of these rules would not only violate Company policy but might be also a civil and/or criminal offence.

Employees should be aware that the promise, offer or delivery of improper benefits in order to influence the decision of the recipient, even if he or she is not a government official, may not only entail disciplinary sanctions but also result in criminal charges. Improper benefits may consist of a gift, payments, favour or other gratuity or anything of value for the recipient, including employment or consultancy contracts with close family or friendly people or associates.

8. Political Contributions

Employees must be aware that electoral laws in many jurisdictions generally prohibit political contributions by corporations to political organizations, parties, committees or candidates.

IDE has adopted a policy not to make such contributions. Except as approved in advance by the Chief Executive Officer or Chief Financial Officer, the Company prohibits political contributions (directly or through trade associations) by the Company or its business units. This includes: (a) any contributions of Company funds or other assets for political purposes, (b) encouraging individual employees to make any such contribution; or (c) reimbursing an employee for any contribution.

Individual employees are free to make personal political contributions as they see fit.

9. Integrity/Probity

In performing their duties, employees of IDE are to act with the utmost integrity. Every Company employee and member of management must act with integrity and respect the rights of clients, suppliers, partners and competitors.

The Directors of IDE and employees who are involved in the management of IDE must give notice to the Company of any legal proceedings that are commenced against them.

In addition, the directors and employees of IDE must inform the Company immediately if they are charged with a criminal offence and provide any further information requested by the Company.

10. Discrimination and Harassment

The Company does not engage in or support discrimination in hiring, remuneration, access to training, promotion and termination of employment or retirement based on race, caste, national origin, religion, disability, gender, sexual orientation, or age. The diversity of the Company's employees is a tremendous asset. IDE provides equal opportunity in all aspects of employment in accordance with the appropriate employment laws.

IDE is against child labour.

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Moreover, the Company does not engage in or support the use of forced labour or the use of corporal punishment towards the employees, mental or physical coercion and verbal abuse. IDE respects the personal dignity, privacy and personal rights of every employee and is committed to maintaining a workplace free from discrimination and harassment. Therefore, the Company will not tolerate any illegal discrimination or any kind of verbal or physical harassment based on sex, race, colour, nationality, ancestry, citizenship, union membership, political affiliation, sexual orientation, religion, age, physical or mental disability, medical condition or marital status. Employees who feel that their workplace does not comply with the above principles are encouraged to raise their concerns with the HR Section without fear of any retaliation against them.

In order to maintain a safe work environment, IDE will not tolerate violence or threatening behaviour in, or related to, the workplace. Employees who experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on Company's premises must immediately report the situation to their Supervisor, the HR Section and the Head of Legal Services.

It has to be noted that IDE recognizes [ISO 26000](#) as a reference document that provides guidance for implementation of socially responsible behavior.

11. Occupational Health and Safety

Being aware of the impact of accidents on the man, the environment, the society and the company itself, IDE sets the Occupational Health and Safety (OH&S) as absolute priority in all activities (Safety First).

IDE's vision is a workplace without any undesirable event, injury or accident. To achieve this one, the Company applies an Occupational Health and Safety Management System according with ISO 45001:2018. In the frame of this Management System, the OH&S Policy is the commitment to uphold and implement the following:

- Complying with current applicable OH&S Greek and European legislation, as well as with any other signed by the Company, OH&S requirement in all work the Company carries out.
- Conducting continuous work to prevent accidents in all work the Company carries out.
- Ensuring the policy by appointing rights, defining roles and supplying the essential resources for its establishment, implementation, maintenance and improvement.
- Documenting the policy with internal procedures and guidelines, which IDE communicates, implements and maintains.
- Improvements objectives and targets are defined and implemented based on previous review results and revised them and in accordance with newer data.

- Aware all the employees and continually educating them for a workplace, where everyone is responsible for his individual safety as well as the neighbour employees' safety. Requiring all the employees to comply with the safety rules and to work following well safety practices, where no relative safety rule exists.
- Exercising influence, as better as the Company can, to convince the suppliers, subcontractors and any other third people to follow abovementioned Policy.

12. Alcohol and Drugs

IDE is committed to maintaining a drug-free workplace. All Company's employees must strictly comply with company policies regarding the abuse of alcohol and the possession, sale and use of illegal substances. It is forbidden to drink alcohol at work or at the Company's premises, except for specific events that take place after approval by the Administration.

Possessing, using, selling or offering illegal drugs and other controlled substances is prohibited under all circumstances while on duty or on Company's premises. In addition, it is forbidden to go to work, or to drive a corporate vehicle under the influence of alcohol or any illegal drug or prohibited substance.

13. Environmental

IDE applies an Environmental Management System according with ISO 14001:2015 standard and is certified for this Management System. In the frame of this Management System the Environmental Policy is the commitment to uphold and implement the following:

- Complying with the current environmental Greek and European legislation, as well as with any other signed by the Company, environmental requirement, in the scope of the operational activities of the Company.
- Conducting continuous work to assess and minimize the adverse environmental impacts that may be caused by its activities.
- Ensuring the policy by appointing rights, defining roles and supplying the essential resources for its establishment, implementation, maintenance and improvement.
- Documenting the policy with internal procedures and guidelines, which IDE communicates, implements and maintains.
- Improvements objectives and targets are defined and implemented based on previous review results and revised them and in accordance with newer data.
- Providing training to the employees in environmental awareness and care.
- Exercising influence, as better as the Company can, to convince the suppliers, subcontractors and any other third people to follow abovementioned Policy.

Employees must seek to save resources and reduce waste and pollutant emissions by effectively supporting recycling and other energy conservation measures. Employees have a responsibility to promptly report any known or suspected violation of environmental legislation or any event that may result in a discharge or emission of hazardous materials.

Responsible sourcing of minerals

IDE complies with applicable laws and regulations regarding the direct and indirect sourcing of critical material and conflict minerals (i.e., when integrated in purchased products). Those materials include "conflict minerals" (tin, tungsten, tantalum, and gold), rare earth elements, as well as other minerals or metals (e.g., bauxite, cobalt, titanium, lithium). IDE has established a policy and a management system to reasonably assure that the "conflict minerals" as well as critical material, which may be contained in products delivered by IDE, are sourced responsibly (i.e., with limited environmental impact and not detrimental to Human Rights).

If employees are uncertain about their responsibility or obligation they should check with their supervisor or unit manager and the Environmental Administrator for guidance.

14. Employees' personal files

The Company respects human dignity and the personal data of its employees. The Company collects from the employees only the necessary information needed by the Greek public authorities and by the Company for its efficient operation. All information is confidential and is given only to authorized personnel.

Human Resources keeps a personal file for each employee with the data (documents, copies of various certificates) required. The type and the way that data are kept are defined by the Company in accordance to the law.

15. Life-long Learning

Company's philosophy focuses on sustainable development and the improvement of employee skills (life-long learning) to constantly assure their employability. For this reason, the Company offers to its employee's continuing education programs - seminars, on-the-job training and job rotation.

16. Record-Keeping, Financial Controls and Disclosures

The Company requires honest, accurate and timely recording and reporting of information in order to make responsible business decisions. All business expense accounts must be documented and recorded accurately in a timely manner. If there is any doubt whether a particular expense is legitimate, the employees should

contact the Directorate of Finance and Administration where they will be provided with the necessary clarifications and guidelines.

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions, must be promptly disclosed in accordance with any applicable laws or regulations and must conform both to applicable legal requirements and to the Company's system of internal controls.

Business records and communications often become public, and employees should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that may be misunderstood. This applies equally to email, internal memos, and formal reports.

Records should always be retained or destroyed according to the Company's record retention policies.

17. Confidentiality

Employees must maintain the confidentiality of confidential/proprietary information entrusted to them by the Company or its customers or suppliers or competitors and to prevent the unauthorised disclosure of such information, except when disclosure is authorized in writing by the Chief Executive Officer or the Board of Directors or required by law or regulations. Confidential/proprietary information means all non-public information the disclosure of which might be useful to competitors or harmful to the Company, its customers, suppliers and contractors or might even harm the national defense, security or public interest. It includes also information that suppliers and customers have entrusted to the Company.

The obligation to preserve confidential/proprietary information remains binding even after termination of employment.

18. Security

IDE has been granted a Facility Security Clearance up and including the level of National Secret / NATO Secret / EU Secret, issued by the National Security Agency of Greece.

The members of Board of Directors, the Security Office, as well as the employees / officers involved in classified programs have relevant Personal Security Clearance.

There is continuous guarding in company premises by 24x7 guards and CCTVs, so none classified information is going out of the company without the permission of the Chief Executive Officer, the Board of Directors, the Chairman of the Security Committee or the Security Officer.

In addition, there is control of all visitors in the main gate of the facilities, as well as access control system inside the buildings, so only authorised employees and officers have access to the classified information.

These rules are required by the above-mentioned Certificate.

All the employees should be informed of the Certificate and the relevant rules and regulations.

In addition, the Company has been certified with ISO 27001 that provides requirements for an information security management system (ISMS). The information security management system is part of and integrated with the organization's processes and overall management structure and preserves the confidentiality, integrity and availability of information.

All employees have the obligation to satisfy all applicable ISO's requirements.

19. Protection and Proper Use of Company Assets

All employees should protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability and business continuity.

All Company assets should only be used for legitimate, appropriate, and authorized business purposes. Any possible occurrence of fraud, theft, misappropriation or improper use should be reported immediately for investigation.

Company assets should not be used for non-Company business and employees should not seek or perform non-Company business transactions during their paid employment in the Company.

Company assets that are subject to employee protection include proprietary information such as intellectual property, trade secrets, patents, trademarks, copyrights, and business plans, marketing and services, engineering and construction ideas, plans, databases, records, payroll data and generally any unpublished financial data and reports. The misuse or dissemination of this information is considered to be a breach of company policy and may also constitute an offense involving civil and / or criminal penalties.

20. Trade Issues

From time to time, the Greek government, foreign governments, the European Union and the United Nations have imposed boycotts and trading sanctions against various governments and regions, which must be obeyed.

Import - Export and Sanctions

IDE ensures that its business practices are in accordance with all applicable laws, directives and regulations, including economic sanctions and embargoes, governing the import, export and transfer of parts, components and technical data and

services. IDE provides truthful and accurate information and obtains export licenses and/or consents where necessary.

Counterfeit parts

IDE develops, implements, and maintains effective methods and processes appropriate to its products to minimize the risk of counterfeit parts and materials being delivered. Effective processes are in place to detect, report and quarantine counterfeit parts and materials and to prevent such parts from re-entering the supply chain. If counterfeit parts and/or materials are detected or suspected, IDE provides immediate notification to the recipient of such counterfeit parts and/or materials.

Product Safety and Quality

IDE complies with all laws and regulations on product safety and quality whilst delivering products and/or services to agreed product safety and quality standards. IDE has in place quality assurance processes to identify any defects and implement corrective actions.

The General Director of Financial and Administrative Services of the Company and the Quality Manager be in a position to provide correct information on the current status in relation to these issues.

21. Waivers of the Code of Business Conduct and Ethics

Any waiver of this Code for executive officers or directors is permitted only if it has received the relevant approval from the Board of Directors and is immediately notified as required by the applicable legislation.

22. Reporting any Illegal or Unethical Behaviour

Employees are encouraged to talk to supervisors, managers, HR, Legal, Security Officer about observed behaviour, which they believe may be illegal or a violation of this Code of Conduct or Company policy or when in doubt about the best course of action in a particular situation. It is a policy of the Company not to allow retaliation, sanctions or unfavorable or discriminatory treatment, of employees who make such reports in good faith and in an impartial manner, even if the facts are subsequently shown not to give rise to any follow-up by appropriate actions or measures.

Employees are expected to cooperate in internal investigations of such phenomena. An internal alert system, in addition to other existing reporting systems, is also available to Company's personnel (employees, casual employees and external staff) to report, freely, directly and on a confidential basis, concerns or incidents relating in particular to violation of the Business Conduct and Ethics.

Complaints/reports can be made orally or in writing, anonymously or eponymously. Warning system: by email at: report@intracomdefense.com

All complaints/reports anonymous and eponymous are evaluated (with the same criteria) by a Competent Committee (consisting by the Head of Human Resources, the Head of Legal Services and the respective General Managers of the Company), in order to judge their importance and the degree of priority for their investigation. Substantiated allegations are resolved through appropriate corrective action and/or discipline measures.

23. Additional Responsibilities of Managers

In addition to their responsibility as employees and their duty to act in a fair and good judgment, the Company's directors must act in an exemplary way, demonstrating integrity and culture, strengthening moral principles in relations with their subordinates, and exerting their business in a fair manner. They must promote open and honest two-way communication with employees in order for the latter to know what is expected of them and to be able to easily seek guidance and assistance in resolving questions and updating in relation to the Code.

24. Compliance Procedures

We must all work to ensure prompt and consistent action against violations of this Code. However, sometimes it is not easy to distinguish the right one from the wrong one. Employees must always be guided in their decision-making by the following basic principles:

- i. avoid any conduct that could damage or risk the Company or its reputation;
- ii. act legally and honestly;
- iii. put the Company's interests ahead of personal interests

Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem.

These are the steps to keep in mind:

- (a) Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.
- (b) Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- (c) Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems. If you are uncomfortable discussing the problem with your supervisor you can talk to your general manager or human resources manager.

- (d) Seek help from Company resources. In a case where it may not be appropriate to discuss an issue with your supervisor, you may address your concerns to the Legal and HR Sections.
- (e) You may report violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. The Company forbids any kind of retaliation against employees who, in good faith, reported violations of the Law, Code, or Corporate Policy.
- (f) Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.

The Code applies to all employees and defines internal control procedures in the event of a breach of its provisions. Employees are required to comply with these procedures and to encourage third parties to do so. Those who violate the Code will be subject to disciplinary sanctions, including possible dismissal.

In order to ensure compliance with the provisions of this Code of Business Conduct and Ethics, the Company requires its employees, at the beginning of their employment and at regular periods thereafter, to become familiar with these provisions on IDE's website where this Code is available.