

## Combating Trafficking in Persons Compliance Plan

### 1. PURPOSE

“INTRACOM DEFENSE S.A.”, with the distinctive title “IDE”, hereinafter referred to as IDE, is opposed to human trafficking and forced labor in any form. IDE is committed to working to mitigate the risk of human trafficking and forced labor in all aspects of its business. The Greek (as the US, UK, EU, NATO, Israeli) Governments has a zero-tolerance policy regarding any Government employees and contractor personnel and their agents engaging in any form of trafficking in persons, defined to mean the recruitment, harboring, transportation, provision or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage or slavery and sex trafficking.

The following sets forth IDE's overall general compliance plan (hereinafter called “**the Compliance Plan**” or “**the Plan**”, as required by the respective applicable legislation.

The purpose of this Plan is:

- a) to make all IDE employees, contractors, subcontractors, and agents aware of the conduct prohibited under the anti-trafficking laws and regulations, as well as under the company's anti-trafficking statement
- b) to make all IDE employees, agents, and subcontractors aware of the actions that may be taken against them for violations
- c) to set out IDE's recruitment, wage, and housing practices

### 2. APPLICABILITY

This Plan sets out the standards for anti-trafficking compliance and applies to all Greek, US, UK, EU, NATO, or Israeli or other Government contracts, subcontracts, cooperative agreements, awards, and sub-awards. Such Plan may be supplemented, amended, or revised, as appropriate for each applicable Government contract (or applicable portions thereof), depending on the size and complexity of the contract and the nature and scope of the activities.

### 3. CERTIFICATION OF COMPLIANCE PLAN

When required by the applicable legislation, IDE will certify that:

- a) It maintains a combating trafficking in persons compliance plan.
- b) It monitors for any contractor, subcontractor, or agent who is violating this plan.
- c) After conducting sufficient due diligence, and to the best of its knowledge and belief, neither IDE nor any of its contractors, subcontractors, or agents are engaged in prohibited activities.

d) If there are any violations, remedial action has been taken against the violator.

#### **4. AWARENESS PROGRAM**

Pursuant to the legislation of Greece, US, UK, EU, NATO, Israel or other, contractors, contractor employees and their agents are prohibited from:

- Engaging in severe forms (i.e., using force, fraud or coercion) of trafficking in persons during the period of performance of a contract;
- Procuring commercial sex acts during the period of performance of a contract;
- Using forced labor in the performance of a contract;
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent recruiting practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with the local labor laws of the country in which the recruiting takes place;
- Charging employees recruitment fees;
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who was not a national of the country in which the work is taking place and who was brought into that country for the purposes of working on a Government contract, subcontract or portion(s) of contracts or subcontracts performed outside of his country;
- Failing to provide return transportation or pay for the cost of return transportation upon the end of employment, for an employee who was not a national of the country in which the work is taking place and who was brought into that country for the purposes of working on a Government contract, subcontract or portion(s) of contracts or subcontracts performed outside of his country, if the payment of such costs is required under existing temporary worker programs or pursuant to a written agreement with the employee for portions of contracts and subcontracts performed outside of his country;
- Providing or arranging housing that fails to meet the host country housing and safety standards; and

- If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating.

## **5. EMPLOYEES**

According to the employment contracts and the Internal Labor Regulations of IDE all employees must comply with the policies, procedures and principles of IDE, including the IDE Code of Business Conduct and Ethics and agree to report any violations of which they are aware.

The IDE Code of Business Conduct and Ethics is publicly posted on its website:

<http://www.intracomdefense.com>

Any violation of the applicable legislation and/or this Plan could result in disciplinary action which may include but is not limited to, an employee's removal from a contract, reduction in benefits or termination of employment.

## **6. SUBCONTRACTORS/AGENTS**

Applicable legislative clauses are flowed down to IDE subcontractors. Subcontractors/agents are also provided link to the IDE Code of Business Conduct and Ethics and asked to certify that they have read and understood this document.

IDE agents and subcontractors must have procedures to prevent trafficking in persons and to monitor, detect and terminate any agents, subcontracts or subcontractor employees that have engaged in such activities.

Failure to comply with the requirements of any applicable legislation and/or this Plan is grounds for IDE to take any and all appropriate actions, up to and including immediate termination of that subcontractor's or agent's contract with IDE.

## **7. SUPPLIERS**

IDE has undertaken a review of its suppliers that it believes could reasonably fall within the requirements of the applicable legislation, to determine what steps the supply base is taking or has taken to comply with the requirements. All suppliers included in the review were also provided with training and information on combating human trafficking.

## **8. CONTINGENT WORKERS**

As part of the onboarding process, IDE provides each contingent worker, through their employer, a copy of IDE's Code of Business Conduct and Ethics, and IDE Compliance Plan Combating Trafficking in Persons, and requires certification:

- that they have received all of those documents, that they have read and understood

- those documents and that they agree to abide by them; and
- that they acknowledge that the principles of legal and ethical business behavior set forth in those documents apply to their conduct as a contingent worker performing work for IDE; and
  - that they know they are expected to, and have a responsibility to, report any concerns or possible violations, without fear of retaliation and subject to employee protection.

## **9. RECRUITMENT AND WAGE PLAN**

To the extent that IDE uses recruitment companies, only recruitment companies with trained employees may be used, no recruitment fees may be charged to the employee and all wages must meet applicable host-country legal requirements or explain any variance

## **10. HOUSING PLAN**

Typically, IDE does not provide housing. In the event that IDE is required to provide or arrange housing under a Greek, US, UK, EU, NATO or other Government contract, such housing will be provided that meets host-country housing and safety standards.

## **11. REPORTING PROCESS**

Employees should consult the Chief Human Resources Officer or the Head of Legal Services and Compliance Officer if they are uncertain whether a specific action would be in violation of this Plan, of any related legislation or the IDE Code of Business Conduct and Ethics.

IDE has one reporting channel which enable us to monitor the compliance culture at IDE. "Tell us your concerns", our internal case management system, enables our employees to raise concerns and for us to spot trends or incidents, before they might become serious non-compliance issues.

While IDE's whistleblowing system at Ethics Address ([report@intracomdefense.com](mailto:report@intracomdefense.com)), is used if employees experience a serious breach of IDE's Employee Code of Conduct, of this Plan, policies, and/or procedures and do not feel comfortable reporting their concerns to their manager, Ethics Address can also be used by our external stakeholders, such as employees of third parties to IDE.

Retaliation against an individual who reports a violation is strictly prohibited.

## **12. NOTIFICATION**

IDE shall promptly inform the Contracting Officer upon receipt of credible information alleging a violation of any applicable legislation related to Combating Trafficking in Persons and any actions taken against an IDE employee, subcontractor, subcontractor employee or their agent pursuant to such legislation.

### **13. POSTING**

IDE shall post its Compliance Plan on IDE's website.

IDE shall provide its Compliance Plan to the Contracting Officer upon request.

### **14. CERTIFICATIONS**

IDE will provide certifications to the Contracting Officer as required by any applicable legislation.

**Koropi, September 23, 2024  
For and on behalf of  
INTRACOM DEFENSE SA**

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**Angeliki Petropoulou  
Head of Legal Services  
Compliance Officer**