
ANTI-CORRUPTION COMPLIANCE PROGRAM SUMMARY

1. Since its foundation, INTRACOM DEFENSE S.A. (IDE) business practices have been governed by integrity, honesty, fair dealing and full compliance with all applicable laws. IDE has committed to these values and Corporate Business Principles worldwide.

In this context IDE has issued: its Code of Business Conduct and Ethics, IDE Supplier Code of Conduct and IDE Combating Trafficking in Persons Compliance Plan.

To guide IDE employees, ensure good business conduct, and align to legal requirements, IDE has developed an Anti-Corruption Compliance Program.

This program describes why and how we work with anti-corruption, and covers all the most common forms of corruption.

2. The program is aligned with the requirements and provisions of :
 - i. the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions,
 - ii. the United Nations Convention Against Corruption (UNCAC),
 - iii. the European Anti-Corruption Conventions
 - iv. the Greek anti-corruption legislation.
 - v. The Israeli anti-corruption legislation
 - vi. the U.S. Foreign Corrupt Practices Act,
 - vii. the UK Bribery Act
 - viii. the French Anti-Corruption Law (“Sapin II”)

3. STEPS

The Anti-Corruption Compliance Program Is implemented in eight steps.

STEP 1: TOP-LEVEL COMMITMENT

STEP 2: RISK ASSESSMENT

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- Country risk assessment
- Job function risk assessment
- Enterprise risk assessment

STEP 3: POLICIES AND PROCEDURES

STEP 4: TRAINING AND COMMUNICATION

STEP 5: DUE DILIGENCE

- For agents and intermediaries:
- For business partners:

STEP 6: EXPENDITURES

STEP 7: MONITORING AND INTERNAL CONTROLS

STEP 8: REPORTING, INCENTIVES AND DISCIPLINARY MEASURES

- (IDE's whistleblowing system at Ethics Address (report@intracomdefense.com)).

4. CONCLUSION

The anti-corruption compliance program is consistent with all applicable laws.

Compliance with the anti-corruption compliance program is mandatory to all levels, functions and areas of the company.

The anti-corruption compliance program is directed at employees as well as relevant business partners.

The anti-corruption compliance program is continuously adapted to changing business environments and internal learning.

The company publicly reports on its anti-corruption compliance program to counter corruption.

The Board of Directors and Compliance Department have the ultimate responsibility for the oversight of the anti-corruption compliance program.

The senior management monitors whether policies and procedures are applied on a day-to-day basis.

The Board of directors and the Compliance Department react to immediate irregularities and/or serious challenges relating to the anti-corruption compliance program.