ENVIRONMENTAL REPORT 2024

INTRACOM TELECOM

Introduction

Environmental performance is of prime importance within Intracom Telecom, which is in line with the company's commitment to transparency, accountability, compliance with the law and overall Corporate Responsibility. By managing and improving its environmental performance, Intracom Telecom earns the trusts of employees, customers, local communities and other significant stakeholders. Environmental management is reflected in the company's policies, procedures and practices.

Scope

This report provides consolidated data on Intracom Telecom's environmental performance in the time period January 2024 - December 2024 and covers company operations at Peania, Patras and Thessaloniki sites.

Environmental Policy

Intracom Telecom has developed a series of policies that guide its environmental efforts. These policies declare the company's values and lead management decisions. Intracom Telecom's environmental policy is embedded in the company policy addressing all Management Systems of the company (please refer to Company Policy on company's website).

Design of Products

Intracom Telecom has defined basic rules in product design and development, focusing on the minimization of environmental impacts caused by product life cycle (including packaging). Eco design fundamentals are adopted by Intracom Telecom in order to optimize and facilitate the use, repair, upgrading, re-use, disassembly and recycling of the products designed and developed by the company.

Intracom Telecom's (ICT) products are considered low energy consumers. Eco design fundamentals are taken into account with a view to minimizing the products' environmental impact, while economic factors, technical feasibility and opportunity for innovation are given due consideration. Indicatively, in order to improve products' longevity and recyclability (circular design) as well as modularity, upgradeability and reparability, the company adopts rules to facilitate product disassembly and reuse and ease of recycling through the use of standard components, easy access and removal of batteries within products, availability of spare parts etc. It also promotes the use of less complex tools necessary for disassembly at the end of product life and the use of recyclable materials where technically feasible.

Environmental Management System (ISO 14001:2015)

Intracom Telecom is committed to conducting its business in an environmentally sound and sustainable manner and takes precautionary measures to protect the environment and minimize any negative environmental impacts that may result from its daily operations. The company defines and documents identification and evaluation methods of all environmental aspects of its operations and their associated impacts. Evaluation is performed against predefined criteria including legislative and other regulatory requirements.

In the framework of ISO 14001:2015, environmental risk assessment has been implemented on all of the company's sites in Greece.

The company has established an Environmental Management System (EMS) which is certified in accordance with the international standard ISO 14001:2015 by an independent certification body for its compliance with the abovementioned standard, since 2001 (please refer to Certificates on company's website).

Intracom Telecom's EMS, which is integrated with the company's Quality, Health and Safety, Information Security, Privacy Information, Business Continuity and Service Management Systems, relies among other on personnel awareness and responsibility, management responsibility and continuous improvement philosophy to meet its environmental goals and drive its environmental performance.

The company seeks continual improvement by setting specific environmental objectives based on identified environmental impacts, on compliance obligations and risks and opportunities and by monitoring and documenting the achievement of these objectives.

Intracom Telecom recognizes that environmental responsibility is crucial to its long-term success. Developing, manufacturing and marketing products that are not energy demanding and can be reused, recycled or safely disposed, as well as using environment-friendly manufacturing methods and enhancing employee awareness and training, contribute to the company's aim towards sustainable development.

Waste Management

Intracom Telecom acknowledges that minimizing waste and increasing reuse, recycling and recovery is key in circular economy context. Indicatively, waste at Intracom Telecom includes used electrical and electronic equipment (e.g. PCs of no further use, rejected finished or semi-finished products, etc.), building installation lighting, non-usable cables, metals (e.g. iron, aluminum, etc.), timber (e.g. pallets, wooden reels, etc.), packaging waste (e.g. cardboard, plastic bags, etc.), printed material, lead batteries (e.g. from uninterruptible power supply units-UPS), small batteries, etc. Depending on their physical and chemical properties, waste produced is collected by authorized companies (subcontractors) and delivered to authorized facilities for provisional storage, sorting, recycling, treatment, recovery or disposal.

Various waste management programs with regard to non-usable electrical and electronic equipment, cables, metals, timber, packaging waste, printed materials, lead-acid batteries, small batteries, lamps, empty printer consumables etc. are in place within the company.

Having explored all possible reuse opportunities, the company manages its waste in cooperation with authorized companies (subcontractors) with whom has contracts in effect. All wastes - according to their categorization with regard to European Waste Catalogue (EWC) - are collected by the subcontractors according to relevant environmental legislation. Indicative figures regarding wastes generated and recovered from all Intracom Telecom premises in Greece are as depicted in Table 1.

Table 1: Generated and recovered waste per category (indicative)

Waste category[1]	Quantity generated and recovered (tn) 2024
Electrical and electronic equipment	26.84
Bulky waste	14.58
Metals	9.91
Timber	5.81
Paper and cartons	4.43
Lead-acid batteries	4.36
Various chemical waste	2.07
Paper and cardboard packaging	1.89

[1] Municipal wastes are excluded

Various consolidated waste data and relevant KPIs are depicted in Table 2 and Table 3 respectively.

Table 2: Consolidated waste data

Waste category[1]	Qty generated (tn) 2024
Hazardous wastes	17.60
Non-hazardous wastes	56.30
Recovered wastes	70.07

[1] Municipal wastes are excluded

Table 3: Waste KPIs

Waste category[1]	KPI expression	2024
Hazardous wastes	Waste (Kg) / person	14.77
Non-hazardous wastes	Waste (Kg) / person	47.23
Recovered wastes	Waste / Total waste (%)	94.82

[1] Municipal wastes are excluded

Chemical substances that are used anywhere within the company's premises are treated with the utmost care according to the relevant Material Safety Data Sheets (MSDS) and only by authorized and trained personnel. MSDSs corresponding to all chemicals used in Intracom Telecom can be found on site, where the chemical is used, and are also accessible through the company's internal portal (Interact). Chemicals consumption for 2024 was approximately 6 tons.

Furthermore, good environmental practices regarding waste management followed in Intracom Telecom include:

- Use of integrated information systems aiming to restrict the consumption of paper.
- Reusing of pallets when possible.
- Donating surplus PCs to schools and other institutions.
- Requiring the company's restaurant subcontractor to recycle the used kitchen oil.

Air Emissions

Air emissions at Intracom Telecom are measured by an independent laboratory in order to assess their particulate matter according to environmental legislation. The result of measurements carried out at two points within the company's premises (4.1 and 0.2 mg/m^3) revealed that there is negligible particulate emission and therefore no impact to local society (relevant limit is 100 mg/m^3 according to presidential decree 1180/1981).

Noise

Noise is measured in-house, in order to assess noise level at the boundaries of the company's property. Measurements revealed that the emitted sound is less than the limit imposed by the environmental legislation (65 dB). There are no significant noise sources within the premises, therefore the relevant figures are almost entirely attributed to the traffic noise from the adjacent roads.

Water

Intracom Telecom recognizes the importance of natural resources and is committed to their responsible use and preservation for future generations.

Intracom Telecom does not use significant amounts of water in its operations. Water utilization within the company's facilities is primarily associated with sanitary use, cleaning and garden irrigation activities. A very small amount of water rinses from the printed circuit boards' facility ends up as liquid waste, which is collected and treated by an authorized subcontractor, thus leaving company's wastewaters free from chemicals.

Used water for sanitation and cleaning purposes is collected by an authorized company and is transported via tank trucks to municipal biological wastewater treatment facilities, thus posing no threat to local aquifers. Nevertheless, the company carries out regularly chemical and microbiological analysis of the aquifer water in order to detect any abnormalities.

In 2024 the company used 14954 m^3 of potable water[(2)] in all of its premises in Greece (11.72 m^3 average annual consumption / person).

[(2)] Estimation, as per bills issued by water supply companies up to date.

RoHS Directive

Intracom Telecom has taken all necessary steps to ensure that its products comply with the EU directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment (recast RoHS directive - 2011/65/EU / Greek law Presidential Decree 114/2013) and its amendments e.g., Commission delegated directive (EU) 2015/863.

As a result, Intracom Telecom products do not contain cadmium (Cd) above 0.01% and mercury (Hg), lead (Pb), hexavalent chromium (Cr6+), polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), bis (2-ethylhexyl) phthalate (DEHP), benzyl butyl phthalate (BBP), dibutyl phthalate (DBP), diisobutyl phthalate (DIBP) above 0.1%. All components and materials used in products' manufacturing conform to the RoHS directive and are selected during the products' design phase.

REACH Regulation

REACH regulation (EC 1907/2006) aims to improve the protection of human health and the environment through the better and earlier identification of the intrinsic properties of chemical substances. This is done by the four processes of REACH, namely the registration, evaluation, authorization and restriction of chemicals.

REACH Regulation requires that any companies operating in the EU, comply with various legal obligations, including informing customers about the use of "Substances of Very High Concern" (SVHC) that are listed on the so-called "REACH Candidate List".

REACH Article 33(1) obliges suppliers of articles to inform the recipient of such articles with sufficient information, available to the supplier, to allow safe use of the articles. This obligation includes, as a minimum, the provision of the names of any "Substance of Very High Concern" (SVHC) listed in the candidate list and which is contained in articles in a concentration above 0.1% weight by weight.

Intracom Telecom has taken all necessary steps to obtain the above information from its suppliers and comply with REACH regulation and its amendments. The relevant information is regularly updated due to the constant expansion of the SVHC list.

Packaging and Packaging Waste Directive

The EU Directive on Packaging and Packaging Waste (94/62/EC) and relevant Greek law 2939/2001 restrict the presence of certain heavy metals in packaging (mercury [Hg], lead [Pb], hexavalent chromium [Cr6+] and cadmium [Cd]) aiming at protecting the environment from hazardous substances and materials. The EU Packaging Directive also includes requirements for registration, reporting, and recycling in each EU Member State when a company is considered a "producer".

Intracom Telecom has taken all necessary steps to ensure that materials used for the packaging of its products comply with the above-mentioned law and its amendments.

Furthermore, since Intracom Telecom is considered a "producer", the company participates in the nationwide Collective Alternative Management System (compliance scheme) - "RECYCLING" (organized by "HE.R.R.CO" - Hellenic Recovery Recycling Corporation, national register of producers no.: 1751) for the collection, sorting and recycling of used packaging materials.

Intracom Telecom submits packaging data put to the market on an annual basis as per the relevant packaging compliance scheme requirements. The company undergoes regular audits by independent bodies of chartered accountants, who are responsible to verify the packaging quantities put to the market declared by the company to the relevant compliance scheme.

WEEE Directive

The amount of waste electrical and electronic equipment (widely known as WEEE or e-waste) generated every year in the EU is increasing rapidly. Directive 2012/19/EU (Greek law 23615/2014) defines rules on WEEE with the aim of contributing to sustainable production and consumption.

WEEE at Intracom Telecom includes a large range of devices such as various telecommunications equipment, computers, printed board assemblies, components etc. at the end of their life.

This type of waste contains a complex mixture of materials, that can cause major environmental and health problems if the discarded devices are not managed properly. In addition, modern electronics contain rare and expensive resources, which can be recycled and re-used if the waste is managed effectively.

Intracom Telecom's priority is to enable multiple lifecycles for its products and components inside them, adopting an approach that end-of-use is not necessarily end-of-life, thus enabling the creation of circular supply chains. Recycling is the last resort, after all options of reuse have been exhausted.

Intracom Telecom complies with various requirements of electrical and electronic equipment e.g., product marking with crossed-out wheeled bin according to EN 50419:2006 standard and with the company's identification mark, provision of written information to users as applicable according to article 14 of the relevant directive etc.

Intracom Telecom adheres to the Greek National Waste Electrical and Electronic Equipment compliance scheme ("Appliances Recycling S.A." - national register of producers no.: 1751) in order to fulfil its "recycling" obligations according to WEEE directive. Also, depending on the import / export marketing channels and methods used (importing, manufacturing, rebranding, distance selling etc.) Intracom Telecom seeks registration to EU National WEEE compliance schemes as per the transposition of WEEE directive to the relevant National laws.

The company has already been registered to the British and Italian approved producer compliance schemes Environment Agency U.K. (company reg. no.: WEE/DG5614VR) and Consorzio ERP Italia (national register of EEE producers no.: IT18010000010156).

Products put on the market in 2024 by Intracom Telecom, considered within directive's 2012/19/EU scope, will be collected and recycled by the relevant compliance schemes - with whom the company has

active contracts - after their end of life. Intracom Telecom finances the products' collection and recycling on the basis of the quantities of products put on the market.

For 2024 the declared quantities of Intracom Telecom to the relevant WEEE compliance schemes were approximately 222 tn.

Intracom Telecom submits EEE data put to markets monthly or annually depending on the relevant national WEEE compliance scheme requirements. The company undergoes regular audits by independent bodies of chartered accountants, who are responsible to verify the EEE quantities put to the market declared by the company to the relevant compliance schemes.

Batteries Directive

Batteries used in Intracom Telecom's products and solutions comply with directive 2006/66/EC (Greek law 41624/2010) and its amendments, (e.g. 2023/1542/EC), aiming among other at protecting the environment.

Due to the Commission Implementing Regulation 2017/699, producers of Electrical and Electronic Equipment (EEE) putting to the market batteries incorporated in their products, have certain environmental obligations. In order to comply with the above legislation, the company registered to the national compliance schemes for consumer batteries (AFIS S.A., national register of producers no.: 1751) and lead - acid batteries (Re-Battery S.A., national register of producers no.: 1751). Relevant data are submitted quarterly or annually depending on the schemes' requirements. The company undergoes regular audits by independent bodies of chartered accountants, who are responsible to verify the batteries quantities put to the market declared by the company to the relevant compliance schemes.

Greenhouse Gas Emissions / Energy Savings

The major cause of climate change is believed to be global warming, resulting from the increasing concentrations of CO_2 and other greenhouse gases (GHGs) on earth. In order to deal with climate change, Paris Agreement came into force in November 2016, setting the target of keeping the global temperature rise below 2°C, above pre-industrial levels and calling for efforts to limit warming to 1.5°C.

Intracom Telecom understands the importance of addressing and contend with climate change and has taken steps to support the 1.5°C initiative.

To precisely measure and manage our greenhouse gas emissions, we have categorized them into three scopes, which are defined by "The Greenhouse Gas Protocol" based on their proximity to business and operation:

- Scope 1 emissions are direct GHG emissions that occur from sources that are controlled or owned by the company.
- Scope 2 emissions are indirect GHG emissions associated with the purchase of electricity, steam, heat, or cooling.
- Scope 3 emissions are indirect GHG emissions both upstream and downstream of an organization's main operations.

Intracom Telecom's carbon footprint from Scope 1 and 2 emissions is largely dependent on energy consumption at company facilities (offices, labs and computer rooms).

In this context the company is aiming at reducing its Scope 1 and Scope 2 emissions by 50% by 2030, taking 2019 as the baseline year. Intracom Telecom calculates and monitors greenhouse gas emissions produced from its activities, using internationally approved calculation standards for greenhouse gas emissions such as "The Greenhouse Gas Protocol" etc.

Therefore, the company has set targets to reduce its Scope 1 and 2 carbon footprint by 15% for 2021 and 2022, 20% for 2023 and 2024, and 25% for 2025 - with respect to 2019. Purchasing electricity generated from renewable or other low-carbon sources is a key component of Intracom Telecom's GHG reduction strategy. Renewable energy is believed to replace fossil fuels in electricity production contributing to lower carbon emissions and cleaner environment.

ESG & Quality Organisational Unit is responsible for assessing and monitoring climate related risks and opportunities. Decisions for action are taken by top management.

In 2024 the amount of purchased and consumed electricity, heat, steam or cooling was 5550 MWh while the energy from fuels used by the company (diesel or natural gas for heating, fuel consumed by company cars) was 3182 MWh.

A share of 14% (784 MWh) of the company's purchased electricity was produced from renewable sources. Namely, in 2024 Intracom Telecom sourced energy equivalent to 266.82 tn CO_2e from renewable energy sources regarding its operations in Greece in the form of Guarantees of Origin (GOs). GOs (Transaction Number: 2024103000026, dated 30-10-2024) were issued by DAPEEP (Operator of RES and Guarantees of Origin) according to Ministerial Decision No.Δ6/Φ1/οικ. 8786/6-5-2010.

Actual figures for Scope 1, Scope 2 and Scope 3 (Business Travel & Employee Commuting) emissions in years 2019 to 2024 and targets for Scopes 1+2 for 2021 to 2025 and for Scope 3 for 2030 are depicted in Table 4. Calculations have been carried out in accordance with "The Greenhouse Gas Protocol" (A corporate Accounting and Reporting Standard - Revised Edition).

Table 4: GHG figures

	GHG emissions (tonnes CO_2e)	2019	2020	2021	2022	2023	2024	2025	2030
Scope 1+2	Electricity	3745	3817	1988	2263	2008	1623		
	Vehicles (owned / controlled)	679	611	588	586	575	621		
	Heating	226	262	328	349	288	206		
	Other emissions[3]	88	195	141	6	139	116		
	Total	**4738**	**4885**	**3045**	**3204**	**3010**	**2566**		
	Target			<4027	<4027	<3790	<3790	<3554	<2369
Scope 3	Business Travel	358	66	27	119	180	143		
	Employee Commuting	1789	1220	1061	1239	1353	1270		
	Total	**2147**	**1286**	**1088**	**1358**	**1533**	**1413**		
	Cumulative Average[4] (as a percentage of 2019 value)		60%	55%	58%	61%	62%		
	Cumulative Average Target								<80%

[3] Scope 1 emissions from sources such as auxiliary generators, fugitive emissions etc.

[4] Cumulative average is the average of the annual values of total Scope 3 emissions (expressed as a percentage of 2019 value) spanning from 2020 up to the current year. E.g. the Cumulative Average for 2022 is calculated using the formula {[Total Scope 3 (2020) / Total Scope 3 (2019)] + [Total Scope 3 (2021) / Total Scope 3 (2019)] + [Total Scope 3 (2022) / Total Scope 3 (2019)]} / 3.

According to the above figures Intracom Telecom is well within its GHG emission targets.

Scope 3 emissions cover Employee Commuting (by cars and by coaches) and Business Travels.

In order to perform Scope 3 calculations, primary data is collected internally (e.g., number of journeys and mileage from HR & Admin Organisational Unit, number of domestic, short and long-haul flights regarding business travels from Accounting Organisational Unit etc.) while various industry average data used in GHG Protocol approved tools were used.

Indicatively, Mobile Combustion GHG Emissions Calculation Tool (version 2.6) uses various industry average emission factors to facilitate calculation of car, bus, truck and airplane emissions for different fuel types.

Scope 3 emissions in tn CO_2e amounted to 1413 tn for 2024.

The company is undertaking efforts to reduce energy consumption and its carbon footprint such as infrastructure, equipment and electricity networks preventive maintenance programs, improved energy usage management with regard to air-condition units using Building Management System platforms, building insulation improvements, closed loop water cooling systems, use of heat pumps, personnel awareness schemes regarding “save energy” attitude, use of teleconferencing facilities, teleworking, data virtualization based IT infrastructure architecture, coaches hiring for the transportation of personnel from central points in the city to Intracom Telecom etc.

Furthermore, the company plans to change all of its conventional illuminators with LED technology ones, within 2023-2025.

Equipment using gases potentially conducive to climate change and ozone depletion e.g., HFCs undergoes regular preventive maintenance, leak tests etc., by certified technicians, according to relevant environmental law.

Accounting and Reporting on GHG Emissions

Intracom Telecom has participated since 2008 in the CDP (formerly known as Carbon Disclosure Project) and has been reporting through CDP to specific customers / interested parties on its carbon footprint.

Also, since Q3 2021 the company issues a Climate Action report, available publicly through its website, regarding its Scope 1, Scope 2 and Scope 3 (Business Travel and Employee Commuting categories) emissions (please refer to Climate Action on company's website).

Natural Environment – Conservation Areas

The company's sites are not located in the vicinity of protected / conservation areas therefore do not have any impact on the corresponding natural environment.

Contribution to Sustainable Development

Intracom Telecom's latest innovation focuses on energy-efficient telco data centers. The Dynamic Datacenter Sizing (DDS), a pivotal feature of the NFV-RI™ platform has been designed to elevate the energy and resource efficiency in telco data centers by integrating cutting-edge Artificial Intelligence (AI) to dynamically adjust resource use in real-time. Real-world tests with major cloud providers confirmed DDS reduces energy consumption and operational costs by up to 30%, while maintaining high performance and stability, solidifying its role in advancing energy-efficient telecom networks.

Intracom Telecom's Wireless Backhaul products have been enhanced with Power Save mode functionality, and uni|MS™ platform offering Network Lifecycle Management & Automation is under continuous evolution to orchestrate energy consumption optimization while peak traffic is being served. Extending the NMS, Planning and SDN existing feature set with the brilliance of Artificial Intelligence (AI), Dual-Band radios energy consumption is reduced by up to 30% per physical link.

Intracom Telecom developed innovative IoT solutions for managing and controlling smart devices in areas like smart lighting, smart parking, waste management, and noise monitoring in smart cities. Intracom Telecom also offers comprehensive IoT solutions for energy management, water management, and industrial IoT. Latest Smart City projects concern the Municipalities of Chalkis and Piraeus (Smart Port).

Environmental Accidents and Complaints

During the reporting period, no environmental accidents or complaints were filed, and no environmental fines were incurred. No health and safety issues with regard to the use of Intracom Telecom products by its customers has been reported so far.

Employees' Environmental Awareness

Intracom Telecom aims to increase its employees' environmental awareness through induction activities, reviews and audits. Employees are informed about the company's environmental policy, and relevant activities and initiatives, such as the waste management processes implemented, during the induction seminar at the beginning of their employment. Notifications and reminders to the employees covering best environmental practices are circulated and published in the company's internal website.

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