

INTEGRATED MANAGEMENT SYSTEM POLICY OF TELEGROUP BELGRADE

General

TeleGroup is the company that provides high quality ICT solutions, IT and other services to organizations operating in Serbia, BiH, Bulgaria, Montenegro, Macedonia, Germany, the Middle East, Africa, etc.

Having in mind the company's mission, vision and development strategy, as well as its organizational structure, the management opted for an integrated IMS Policy which includes: quality management, environmental protection, occupational health and safety, energy management, anti-bribery and corruption, information security, provision of IT services, business continuity. This policy applies to all branches and representative offices established by TeleGroup Belgrade.

In accordance with **the latest versions of appropriate ISO standards** and best practice in planning and implementing management processes of all systems, the management of TeleGroup Belgrade is committed to a **process approach and risk-based thinking**, which should enable sustainable long-term business, timely identification of factors that could affect deviations in planned and expected results. Preventive management enables that **risks** and negative effects are minimized and maximum use of **opportunities** when they occur.

Continuous improvements and continuous improvement of the effectiveness and efficiency of IMS is achieved through:

- Regular setting and measuring the achievement of goals and programs, measuring the performance of the processes through KPI
- Problems and identified errors are considered opportunities for innovation and improvement of the company's business processes
- Continuous investment in human resources, regardless of the age, gender and level of education, through internal and external training
- Education and encouragement of employees at all levels and functions to be committed to preventive action and continuous improvement of systems and processes
- Affirmation of leadership as one of the principles of management
- Improving the balance between private and business life of employees and business atmosphere based on cooperation, trust, partnerships, a sense of belonging to the company, high ethical standards and consulting and involving employees in creating and improving IMS, business processes and services
- Periodic investment in equipment and information system in order to maintain a modern technological level of equipment and internal and external communication

We are committed to performing all activities in accordance with all applicable laws, regulations and other requirements.

Managers of all organizational units are required to effectively apply this IMS Policy, related plans, procedures, instructions, regulations and more in all activities.

Quality policy

- Recognizing and meeting the expressed and unexpressed needs of users, through the implementation of the best solution for each user individually
- Development of mutually beneficial relationships with all stakeholders of the company (customers, suppliers, public sector, media, wider community, etc.)
- Providing timely and complete after-sales support
- Expanding the range of products and services in order to improve the quality of the offers
- Satisfying the needs and expectations of employees by applying motivational mechanisms, in order to give their maximum and commitment in ensuring the expected quality of products and services to end users

Environmental protection and energy management policy

Prevention or reduction of environmental pollution is ensured by establishing, documenting and implementing an environmental management system, the success of which is achieved through:

- Taking appropriate measures in order to preserve the land on which the works are performed
- Reducing the use of harmful substances and generating harmful waste
- Collection, sorting and handing over of waste for recycling to authorized operators
- Considering the opinions and suggestions of all stakeholders and taking appropriate measures

- Informing business partners and other stakeholders about our commitment to the environment
- Rational use of energy

By rational use of resources and energy, TeleGroup Belgrade and its employees act conscientiously and responsibly towards the preservation of natural resources.

Our business uses fuel and electricity on a daily basis. Due to the competitiveness of the company and lower operating costs, energy consumption is considered a significant element in a successful business.

The availability of information on energy consumption is the basis for improving energy efficiency, which we achieve by setting clear and measurable goals for energy saving and procurement of energy efficient products and services.

We apply the policy of efficient use of energy to all our facilities and processes, including the use of vehicles and machines.

Occupational health and safety policy

Safety and health at work is being improved in a systematic way with the basic goal of maintaining a long tradition without injuries at work or established occupational diseases. In order to achieve this goal, the following have been established:

- Workplace risk assessment
- Measures and instructions for safe work
- Undertaking preventive measures and means to preserve the safety and health of employees and visitors

Anti-bribery and corruption management policy

TeleGroup requires continuous strengthening of its competitiveness, expansion of portfolios, and preservation of existing and increasing the number of customers, **EXCLUSIVELY** by increasing their satisfaction with the quality and sales conditions of offered or marketed products and services and respecting delivery deadlines or delivery of facilities.

TeleGroup is committed to the highest legal, ethical and moral standards set out in the Code of Business Ethics and Conduct. The principles set out in the Code aim to ensure compliance with all applicable laws regarding bribery and corruption.

The Anti-Corruption Action Plan enables employees to identify potential problem areas, avoid prohibited behavior and seek immediate guidance when necessary to protect, both TeleGroup and its employees, from legal consequences and reputational damage as a result of bribery and corruption.

TeleGroup does not tolerate any form of bribery. All employees and all those acting on behalf of TeleGroup are strictly prohibited from offering, paying, soliciting or accepting bribes.

External and internal risks of bribery are regularly and systematically assessed and adequate risk-based procedures are in place to prevent bribery, including those designed to ensure the following:

- Financial and commercial controls are in place to reduce the risk of corrupt payments, including keeping complete and accurate books and records
- Training to all relevant employees and other key stakeholders is provided in accordance with their activities and associated risks
- Our business partners, customers, suppliers and subcontractors (including sales representatives, business consultants and intermediaries, distributors, lobbyists and other partners who, on our behalf, work to secure, prepare or negotiate offers for new contracts or extensions existing), operate in accordance with applicable local and international laws against bribery and corruption

Information protection and security policy and business continuity

Information security means ensuring its confidentiality, integrity and availability. This policy provides a framework for:

- Maintaining the security of information of the company, partners, employees and other stakeholders
- Protection and continuous availability of IT assets of TeleGroup and its business partners
- Ensuring the continuity of business processes in the event of unwanted threats during operation

Taking care of confidential information and protecting business secrets

In order to confirm the trust of clients, through defining business solutions, professional project management and availability of technical support, we take care of the protection of confidential data and documents of clients and the company itself, while respecting business secrets, copyright and license rights of software producers, as well as confidential personal data.

Risk review

To ensure the confidentiality, integrity and continued availability of information, TeleGroup's information security team has assessed and continuously review information security and business continuity risks.

Business continuity

In situations where it faces unforeseen interruptions, it is essential that TeleGroup responds quickly, methodically and successfully, to ensure that all valuable aspects of the business are protected.

To ensure that services run with minimal disruption, major business risks that threaten service continuity have been identified, appropriate prevention measures and rapid recovery strategies have been developed, implemented and maintained. The objectives of this policy are:

- Identify, assess and control potential and actual risks of critical work and service delivery processes, in order to protect employees, the reputation of the company and the wider community and provide a rapid response to re-establish services when they are discontinued
- Provide procedures for staff to reduce or prevent exposure to risks
- Protect and maintain assets used to provide services
- Implement, regularly test and update the Business Continuity Plan (BCP) when needed
- Regularly review and update planned strategies for the continuity of critical business processes and services
- Provide preparedness for action, rapid response and recovery of activities in the event of disasters or severe unforeseen events.

Use of IT assets

TeleGroup employees, subcontractors and other associates use IT assets for legitimate business purposes, ensuring the information confidentiality, inviolability (integrity) and availability, as well as availability of IT assets.

Effectiveness

An effective information security system is achieved through: application of security instructions, review of security risks, application of control measures to reduce security risks, analysis of possible security incidents, application of advanced technologies and improvement of knowledge in the field of information security.

Partnership with significant vendors

Nurturing partnership with leading ICT vendors, we use and offer proven and reliable solutions for the protection of our and information of our partners and end users of information and communication technologies.

IT services delivery policy

The IT services management policy provides a framework for achieving service levels in accordance with the agreed requirements and the desired internal performance of the process.

Providing high quality IT services and meeting customer expectations, while maintaining profitability, is the main task of employees throughout the company, achieved through:

- Careful capacity planning of IT services
- Providing a budget for the resources necessary to achieve the planned capacity of IT services
- Providing competencies according to requirements, in order to provide IT services from the vendor portfolio
- Effective management of all changes through the application of standard methods and procedures
- Agreed availability of technical support for service request and incident management
- Researching the causes of problems, their elimination and recording, in order to create the learning of the organization
- Monitoring and reporting on performance and resource use

The IMS policy is communicated to all relevant stakeholders (employees, business partners and others) through the company's website.

All employees, subcontractors and other partners acting on behalf of TeleGroup are obliged to adhere to IMS Policy of TeleGroup in their daily work and thus contribute to the achievement of the IMS goals arising from it.

Approved by: Srdjan Radić, director of TeleGroup Belgrade

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