



POLICY AGAINST BRIBERY AND CORRUPTION

FGRID is committed to the establishment, development and continuous improvement of the anti-bribery management system implemented in accordance with the standard ISO 37001:2016.

The company is also committed to the establishment of the application of high standards of ethical conduct as well as its compliance with applicable laws and regulations. The implementation of the above is mandatory for its staff, its partners and all interested parties with which it cooperates or comes in contact.

The company implements a policy of zero tolerance against corruption, bribery or any other illegal act and complies with the legal procedures for punishing staff who violate the policies and procedures.

The company does not cooperate with any organization that is involved with bribery practices or corruption and will immediately terminate any relationship if any such activity occurs.

The company also does not participate knowingly in any exchange that can be understood as bribery or corruption and it requires the same from its staff and partners.

FGRID does not condone the existence of a conflict of interest whether it concerns the management, its staff or its associates.

Every expense of the company must be and is legally reasonable and justified and supported by evidence

The charitable gifts carried out by the company, always have the written approval of the managing director.

The staff and management of FGRID are aware of these policies. If for any reason there is any behavior that violates this policy and the system of anti-bribery, direct contact with the person in charge of the management system against bribery is required.

The management of FGRID authorizes the person in charge of the anti-bribery management system, to take all measures that they deem necessary and to request the appropriate resources from the administration for their implementation.

The management of FGRID is informed from the person in charge of the anti-bribery management system regularly (at least on an annual basis and promptly when it is deemed necessary) for all issues that have to do with the effective implementation of the anti-bribery management system according to the standard ISO 37001:2016.

Managing Director & C.E.O.

Philip P. Papageorgiou

Date

01-03-2022

Signature