FGRID

POLICY AGAINST BRIBERY AND CORRUPTION

FGRID is committed to the implementation, development and continual improvement of the Anti-Bribery Management System it applies in accordance with the ISO 37001:2025 standard.

The Company is also committed to applying high standards of ethical conduct and to complying with applicable laws, rules and regulations. Compliance with the above is mandatory for its personnel, its business associates and all interested parties with which it cooperates or comes into contact.

The Company applies a zero-tolerance policy against bribery, corruption or any other unlawful act and follows the procedures provided for by law for disciplining personnel who violate the Policies and the related procedures.

The Company does not cooperate with organizations involved in bribery and/or corruption practices and will terminate any relationship should any such occurrence arise.

Furthermore, the Company will not knowingly participate in any transaction that could be perceived as bribery or a corrupt practice, and requires the same of its personnel and business associates.

FGRID does not accept the existence of any conflict of interest, whether it concerns Management, its personnel or its business associates.

Every expense of the Company must be, and is, lawful, reasonable and justified, and is supported by documentary evidence.

Charitable donations made by the Company always have the written approval of the Managing Director.

The personnel and Management of FGRID, as well as its suppliers / subcontractors, are aware of this Policy. If, for any reason, conduct that violates this Policy or the Anti-Bribery Management System occurs or is observed, the Anti-Bribery Management System Manager must be contacted immediately.

The Management of FGRID has authorized the Management System Manager and the anti-corruption and anti-bribery compliance function to take all measures they deem necessary and to request the appropriate resources from Management for their implementation.

The Management of FGRID is informed by the Management System Manager and the anti-corruption and anti-bribery compliance function on a regular basis (at least annually, and on an ad hoc basis whenever deemed necessary) on all matters related to the effective implementation of the Anti-Bribery Management System in accordance with the ISO 37001:2025 standard.

Managing Director & C.E.O.

Philip P. Papageorgiou

Date	Signature
07-09-2026	