

Our Company offers a range of services related to the design and implementation of technological business solutions, IT solutions, and the provision of consulting services and system implementation/customization

The Company has implemented an Anti-Bribery Management System by the ISO 37001:2025 standard, with the above services as its scope of application.

Procedures and regulations have been established to prevent and prohibit Bribery.

'Bribery is defined as the offer, promise, giving, acceptance or solicitation of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and regardless of the location(s), in violation of applicable law, as an inducement or reward for a person to act or refrain from acting about the Performance of the duties of that person'.

The procedures and regulations on Bribery are translated into the following rules, among others:

- Bribery is strictly prohibited. That means that any act in which something of value is offered or offered (directly or indirectly) to a person to mislead that person, for example, to obtain or retain a business advantage, is strictly prohibited.
- Any gift, donation and hospitality offered or received must be reasonable, proportionate and appropriate under the circumstances. It could not reasonably be misunderstood as a means or intention to influence the recipient improperly.
- Accounting books and records must accurately and promptly reflect all transactions and other business obligations by applicable accounting standards.
- Bribery is not permissible and must be avoided at all times.
- Bribery of a government official to secure or expedite routine government actions is prohibited.
- The Company does not make any contributions, in cash or kind, to political parties or political organizations or individuals involved in politics.
- Charitable contributions must only be made to bona fide, approved and lawful organizations. That means charitable contributions cannot be made if they secure or could be perceived as securing any improper advantages.
- Conflicts of interest must be avoided. A conflict of interest arises when you have a private interest that could compromise your ability to act in the best interests of our Company.

To achieve the above, the Company's Management:

- Has adopted an Anti-Bribery Management System by the International Standard ISO 37001:2025, which it applies to all its activities.
- It continuously reviews and improves the Anti-Bribery procedures for the effectiveness of the System.
- Sets measurable objectives and targets for dealing with Bribery, which are evaluated in the context of the review of the System by the Company's Management.

Π01 – Anti-bribery policy

- Encourages its staff and associates to report any form of Bribery, ensuring the confidentiality of their report.
- Provides the necessary resources for the smooth, efficient and effective handling of Bribery.
- Has established an independent Committee for Dealing with Bribery Cases.
- Invests in the continuous training, information and education of its executives against Bribery.

The Company's non-compliance with anti-bribery and corruption laws can lead to significant sanctions, fines and severe damage to its reputation. For this reason, the Company will comply with all relevant legislation concerning its activities.

We do not tolerate any form of Bribery in the Company, and our policy is to comply with all applicable laws and regulations to combat it. Under no circumstances do we give or accept bribes or other advantages to or from any person, including government officials, private sector clients, business partners or customers.

Compliance with anti-bribery laws and procedures is the responsibility of all company employees in all processes and operations. The Company expects the same from all its partners.

If staff suspect or observe anything that may violate this policy, they must report it.

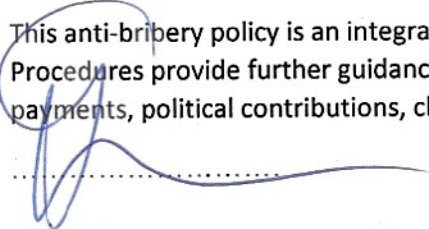
They should raise their concerns with the Anti-Bribery Committee. Alternatively, they can report their problems in the Complaints Box.

The Company will not tolerate any form of retaliation against employees who raise concerns or report what they genuinely believe to be improper, unethical, or inappropriate behaviour. All reports will be treated with complete confidentiality.

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Any external contractor found to have violated this policy may be subject to legal action, up to and including termination of employment.

This anti-bribery policy is an integral part of the company's operations. The company's Anti-Bribery Procedures provide further guidance on specific issues, including gifts and hospitality, facilitation payments, political contributions, charitable contributions, and conflicts of interest.


Constantinos Gakopoulos

Manager

28/1/2026