ANTI BRIBERY POLICY

Principia Energy S.A. has gained the experience and skills that allow us to be present in the renewables sector with plants and projects in operation, construction and development.

The values of We Care, Efficiency, Trust, and Resilience guide us in improving the lives of people, their regions and the environment. This is done with careful actions and in full compliance with all applicable laws and the adoption of transparent and sustainable solutions.

Principia Energy S.A. is committed to developing, maintaining and promoting a strong anti-bribery culture at all organizational levels. The Governing Body, Top Management and all personnel are expected to demonstrate integrity, ethical conduct, accountability and active commitment to preventing bribery. The Company promotes this culture through leadership by example, awareness, training, open communication and consistent application of its anti-bribery principles.

Sensitive to the need to ensure fairness and transparency in conducting business activities, we have adopted tools to protect the expectations of our shareholders, our employees and their work, and those who have relationships and trust in us.

As for ourselves, all stakeholders require full compliance with the rules and principles of conduct defined in the Code of Ethics, in the Organization and Management Model, pursuant to all applicable laws, in the Zero Tolerance Plan for Corruption and in the Compliance Program.

Principia Energy S.A. is committed to identifying, disclosing, assessing and managing actual, potential or perceived conflicts of interest that may compromise impartiality or increase bribery risks. All personnel are required to promptly disclose relevant conflicts of interest and comply with the applicable procedures established to ensure transparent and objective decision-making.

We have decided to align our anti-bribery action with the requirements of the ISO standard 37001, "AntiBribery Management Systems". This identifies an internationally shared support tool for monitoring the correctness of company practices and for their improvement, providing a collegial Compliance Function with adequate autonomy and professionalism.

The Company has established an Anti-Bribery Function with the appropriate competence, authority, independence and resources to oversee the Anti-Bribery Management System, provide guidance, monitor compliance and report on its performance. The Anti-Bribery Function has direct and prompt access to the Governing Body and Top Management whenever bribery-related matters or concerns require escalation.

Principia Energy S.A. strictly prohibits all forms of bribery, whether direct or indirect, active or passive, involving public officials, private entities or third parties acting on behalf of the Company. This prohibition extends to attempted bribery, facilitation payments and any improper advantage offered, promised, given, requested or accepted in connection with the Company's activities.

No adverse behavior is tolerated and if actions to prevent corruption are at risk, we are firmly committed to raising the level of sensitivity and responsibility towards corrective practices and behaviors.

ANTI BRIBERY POLICY

Any violation of this Anti-Bribery Policy or the applicable anti-bribery requirements may result in appropriate disciplinary measures, up to and including termination of employment or contractual relationships, as permitted by applicable law. Where warranted, violations may also be referred to the competent authorities and may give rise to civil or criminal consequences.

We have structured an organic and controlled system of procedures for the prevention of crimes to guarantee an efficient, transparent and correct management, and we commit to promote the ethical principles of a responsible business conduct adopted by the organization and to pursue continuous improvement.

We establish, monitor and periodically review anti-bribery objectives consistent with this Policy, considering identified bribery risks, applicable requirements and the Company's strategic priorities. These objectives provide a framework for evaluating the effectiveness of the Anti-Bribery Management System and supporting its continual improvement

We have also activated a reporting procedure (Whistleblowing Policy) that allows all personnel and stakeholders to report suspicions to the Supervisory and Control Bodies in good faith or based on a reasonable and confidential conviction, without fear of retaliation.

The Company encourages confidential reporting of actual, attempted or suspected bribery, including through anonymous reporting channels, in accordance with applicable law. Principia Energy S.A. strictly prohibits retaliation, discrimination or adverse treatment against individuals who raise concerns in good faith or on reasonable grounds, or who refuse to participate in bribery, even where such refusal may result in the loss of business opportunities.

We are constantly committed to updating our actions for the prevention of corruption by collecting every useful feedback that can ensure the full correctness of our every decision and our every action.

This Policy is communicated to all personnel, made available to relevant interested parties and communicated to business associates presenting more than a low bribery risk. The Company expects its personnel and business partners to uphold the principles of integrity, transparency and ethical business conduct in all activities carried out on its behalf.

All of us at Principia Energy S.A. share the responsibility and commitment to conducting our activities in accordance with applicable laws, organizational rules and the principles of transparency, integrity and honesty.

Athens, November 16th, 2026

Georgios Koukoumelis



Legal Representative of Principia Energy S.A.