



# CODE OF ETHICS



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# Document Revision History

Verze	Dáte	Ôcjet	Dotyčelá věř	Á r řouvéř
1.0	20/12/2010	First Group Code of Ethics	Creation of the ethical framework and fundamental commitments towards stakeholders	Board of Directors
2.0	2012	Consolidation of ethical principles	Addition of references to Human Rights and ILO standards; clarification of integrity and loyalty commitments	Board of Directors
3.0	10/2025	Compliance and ESG update	Integration of CSSF, CSRD, GDPR, whistleblowing, SDGs, supplier due diligence and annual training	Board of Directors

# Preamble

Sword Group is committed to conducting its business with deep respect for individuals, the environment, and the needs of present and future generations. Its international growth is guided by strong values benefiting all stakeholders:

- Clients
- Employees
- Shareholders
- Communities and countries in which the Group operates

As a leader in information technology and project management, Sword Group's objective is to deliver high-quality technological solutions that meet customer expectations. Rooted in innovation and efficiency, this ambition is accompanied by a strong ethical framework and sustainable growth. The Group's core values — respect, rigor and commitment — guide all actions and relationships.

This Code of Ethics complies with applicable regulations, including CSSF principles, European governance directives and CSRD requirements for ESG transparency.

# 1 | Sword Group Values

## Commitment and Accountability

At Sword Group, each employee is entrusted with the necessary means and responsibilities to perform their role. Feedback and suggestions are encouraged. This culture supports the right to try and learn from mistakes and promotes internal career development based on human values.

## Transparency

Sword Group commits to providing clear, timely and complete information to employees, clients and shareholders. Results, trends, objectives and organizational structures are communicated openly, in compliance with confidentiality obligations and applicable regulations, including MAR.

Transparency includes disclosure of financial, non-financial and ESG information in accordance with legal and regulatory requirements.

## Trust

Trust is a fundamental value within Sword Group and is granted by default. In return, the Group expects consistent quality, professionalism and strong adherence to its culture.

## Quality and Professionalism

Quality and professionalism are historical values rooted in Sword Group's technical background. Despite the Group's commercial expansion, these principles remain central to its identity.

## 2 | Our Commitments as an Employer

### Employees

Sword Group believes in loyalty, integrity, motivation and responsibility. Managers commit to:

- Training and supporting employees
- Ensuring fair and consistent remuneration, training and career development
- Promoting teamwork, professionalism and service mindset
- Setting motivating objectives
- Promoting diversity within teams
- Offering organizational flexibility to balance professional and personal life
- Respecting individual privacy

Sword Group strictly complies with GDPR and local data protection regulations.

### Training

Regular training programs are implemented to raise awareness among employees regarding ethics, compliance, data protection and best practices.

### Diversity

Sword Group s'engage à une politique active de non-discrimination et d'égalité des chances à l'embauche et dans la gestion des carrières, reflétant la diversité de la société dans chaque pays.

### Health, Hygiene and Safety

Sword Group guarantees a safe and healthy working environment in compliance with health and safety regulations for employees, suppliers, subcontractors and partners.

### Harassment

Any form of moral or sexual harassment, violence or degrading behavior is strictly prohibited and sanctioned in accordance with internal regulations.

## 3 | Our Commitments as a Business Partner

### Clients

Sword Group delivers business and technological solutions aligned with client expectations, only accepts assignments for which it is qualified, protects confidential information and ensures high-quality service delivery.

### Suppliers

Sword Group builds trust-based relationships with suppliers, subcontractors and partners through responsible purchasing practices and strict confidentiality standards.

### Competitors

Sword Group competes fairly and lawfully, respecting principles of fair competition that foster growth and innovation.

### Anti-Corruption

Sword Group tolerates no form of corruption, influence peddling or money laundering. It complies with applicable anti-corruption, anti-money laundering and financial crime regulations and promotes transparent business practices.

### Conflicts of Interests

Employees must avoid situations where personal interests conflict with those of Sword Group. Any unavoidable conflict must be disclosed and managed transparently.

Executives and Board members are required to formally declare conflicts of interest via the designated internal process.

## 4 | Our Commitments as a Responsible Corporate Citizen

### Local Ecosystem

Sword Group actively supports local ecosystems by engaging in digital sector initiatives, educational partnerships and social projects.

### Environment

Sword Group is committed to protecting the environment in all countries of operation by:

- Complying with environmental regulations
- Identifying and preventing environmental risks
- Managing energy and paper consumption
- Applying responsible purchasing practices
- Promoting circular economy principles through recycling and waste recovery
- Implementing environmentally responsible IT equipment recycling
- Supporting sustainable mobility solutions

These commitments align with the United Nations Sustainable Development Goals (SDGs) and include enhanced supplier due diligence.

## 5 | Ethics Governance and Whistleblowing

### Governance

Management and Human Resources are responsible for the implementation of this Code of Ethics. They review internal and external reports of unethical behavior with confidentiality and regulatory compliance.

### Reporting

Employees and stakeholders may report concerns or seek guidance through the Human Resources department or secure internal channels provided by the Group.

Sword Group commits to:

- Acknowledging all reports
- Conducting thorough investigations
- Evaluating facts objectively and impartially
- Implementing corrective actions and disciplinary measures where appropriate

The whistleblowing framework complies with EU Directive 2019/1937, ensuring confidentiality, protection against retaliation and defined processing timelines.

### Sanctions

Any breach of this Code may result in disciplinary action up to termination of employment and referral to authorities when legally required.



## Conclusion

By adopting this Code of Ethics, Sword Group reaffirms its commitment to ethical and responsible business conduct. These principles contribute to a positive work environment and a strong corporate reputation. All employees are expected to comply with and promote these standards in their daily activities.

Sword Group commits to publishing ethical and ESG indicators in its annual CSRD report to assess the effectiveness of its commitments.