Sword Software Development S.L

CALLE PAU CLARIS, 194 - 196, 08037 - Barcelona (Barcelona)

In Barcelona, on 13 October, 2026

Dear Sir/Madam:

Through this notice, Sword Software Development S.L would like to inform you that we have an Ethics Channel available to anyone who has a relationship with our organization (employees, partners, directors, suppliers, customers, associates, etc.).

The Ethics Channel is a means of reporting incidents through which any activity or conduct that is allegedly irregular and occurs within the organisation, and of which there is knowledge or reasonable suspicion, can be reported anonymously.

We have enabled the address https://sword-software-development.canales-eticos.com, where the digital platform can be accessed to submit new reports or complaints in a simple and intuitive manner, as well as to follow up on a communication or complaint previously submitted.

The Ethics Channel will be managed by an independent third party in order to ensure the impartiality and objectivity required by this type of procedure. Accordingly, the person managing the channel will receive the report and carry out the appropriate assessment and investigation, for which it is essential that the reporting person provides as much information and evidence as possible for assessment.

Sword Software Development S.L wishes to emphasize the protection against retaliation. Any type of retaliation against the reporting person or informant is therefore strictly prohibited, while the presumption of innocence of the person reported is likewise guaranteed until proven otherwise.

It is important to remember that this Ethics Channel constitutes an internal reporting mechanism within the organization. In all cases, the reporting person may also use external channels established by the competent bodies or authorities to report any facts that may constitute a criminal offence.

In this way, Sword Software Development S.L demonstrates its commitment to transparency and corporate ethics. Through our Ethics Channel, we promote compliance within our organization in order to foster an environment of trust both inside and outside it. We therefore appreciate any communication that enables us to correct deficiencies and improve as an organization.

Yours sincerely,

53008247D DAVID MARTINEZ HERNANDEZ (R: B66263641)

Firmado digitalmente por 53008247D DAVID MARTINEZ HERNANDEZ (R: B66263641)
Fecha: 2026.10.13 17:08:34 +02'00'

Signed: _____.

Sword Software Development S.L