



74Software

2025 Corporate Responsibility Report

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AFR The elements of the Annual Financial Report are identified in the table of contents by the AFR icon.

SR The Sustainability Report is identified with this icon.



2025 Sustainability Statement

Extract from the 2025 Universal
Registration Document

Discover the digital
version on

[74SOFTWARE.COM](https://www.74software.com)



A Word from Management



▲ PIERRE PASQUIER
*Chairman of the Board
of Directors*



PATRICK DONOVAN ▶
Chief Executive Officer

“In enterprise software, value creation is a long-term endeavour. It requires the ability to withstand cycles, adapt to technological shifts and maintain a clear sense of direction in an environment that rarely evolves in a straight line.”

In enterprise software, value creation is a long-term endeavour. It requires the ability to withstand cycles, adapt to technological shifts and maintain a clear sense of direction in an environment that rarely evolves in a straight line. In 2025, geopolitical tensions, uneven economic conditions and accelerating technological disruption once again shaped our industry. The rise of artificial intelligence, now moving beyond experimentation into real-world deployment, is one of the clearest illustrations of this profound transformation. These developments demand rigour, discernment and adaptability. They also create substantial opportunities for those able to provide customers with solutions that are reliable, governed and embedded in their most critical operations.

It is in this context that 74Software successfully completed its first full year as an independent software group. This milestone carries particular significance. It validates the industrial and strategic rationale that underpinned the combination of Axway and SBS, and it confirms the soundness of the foundations established from the outset. The guiding conviction behind this project is straightforward: in enterprise software, lasting value is built through strategic independence, disciplined focus, resilient business models and the ability to support customers over time. 74Software was therefore conceived as a diversified portfolio of mission-critical software businesses, aligned with structural customer needs rather than short-term market cycles.

The Group's positioning reflects this ambition in a particularly relevant way. Through Axway and SBS, 74Software brings together complementary expertise at the intersection of enterprise data and critical business processes. Together, these two brands give the Group a distinctive standing in markets where reliability, security, continuity and control in regulated environments are essential. As data and artificial intelligence become ever more central to the way organisations operate, this value proposition is proving increasingly compelling. It offers customers a robust, governed foundation from which to modernise their operations with confidence.

That strategic direction was borne out in 2025, the first full year of the new Group, which in several respects surpassed initial expectations. The diversification of the portfolio strengthened the Group's resilience. The scale achieved supported its capacity to invest. The coherence of the overall model opened up new avenues for development. For these reasons, 2025 should not be seen as an end point, but rather as the beginning of a new chapter for 74Software. Throughout this period, the Board of Directors remained fully engaged, attentive to the strategic coherence of the project, the demands of sound governance and the disciplined management of risk at a decisive moment of transformation and change in scale. The Group's independence, together with the long-term alignment of its stakeholders, will remain at the heart of its development in the years ahead.

Pierre Pasquier

2025 was another year of strong execution and tangible proof points for 74Software, marking the first full year of operation of the Group as an integrated portfolio. Market conditions throughout the year reinforced the relevance of our positioning: customers continued to invest selectively, prioritising solutions that deliver reliability, continuity and clear business value, while increasingly exploring advanced technologies, including AI, and how these technologies can be integrated into existing platforms and workflows.

Execution was therefore our central priority. The Company operates through a disciplined model combining shared corporate chapters with brands led by empowered management teams holding full responsibility for performance, resource allocation and operational delivery. This structure ensures clear accountability, close customer proximity and rigour in decision-making, while capturing scale benefits where they create value.

At brand level, Axway and SBS continued to build on deep, long-standing customer relationships, in many cases spanning decades. This continuity is a defining strength. Customers rely on our software to support core business operations, and our objective is to remain a trusted partner over time as their environments evolve. Operationally and financially, 2025 delivered in line or ahead of our objectives, with strong growth and improved profitability in both brands and a strengthened financial profile supported by growing Annual Recurring Revenue, disciplined cost management and solid cash generation.

Axway delivered consistent, profitable growth, supported by its subscription-based model, sustained margins and improving working capital dynamics. Customer satisfaction and employee engagement remained at very high levels. SBS continued its transition toward a pure software model, with strong product momentum and a marked improvement in both customer satisfaction and employee engagement over the year.

None of this would be possible without the daily commitment of our teams. Across the Company, our teams demonstrated strong engagement, discipline and a clear sense of responsibility toward customers. Our focus remains unchanged: executing with rigour, allocating resources selectively and supporting our customers over the long term, building on trusted relationships, strong products and engaged teams to deliver sustainable growth and durable value creation.

Patrick Donovan

“Our focus remains unchanged: executing with rigour, allocating resources selectively and supporting our customers over the long term, building on trusted relationships, strong products and engaged teams.”



01

74Software Profile

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The 74Software Journey

2001

Sopra creates Axway to structure its infrastructure software and data integration offering.

2005

Expansion in the United States, making Axway a key player in the MFT and B2B integration markets.

2011

Axway becomes independent through a strategic spin-off and is successfully floated on Euronext Paris, marking a significant milestone in its corporate journey.

2012-2017

Axway strengthens its offering portfolio through several acquisitions and adopts a position in API Management and integration platforms.



axway

1968

Creation of the Sopra Group, renamed Sopra Steria, a pioneering IT services company in France and the parent company of Axway and SBS.



SBS

2012

Sopra groups together its banking software activities in a dedicated entity: Sopra Banking Software (SBS).

2013

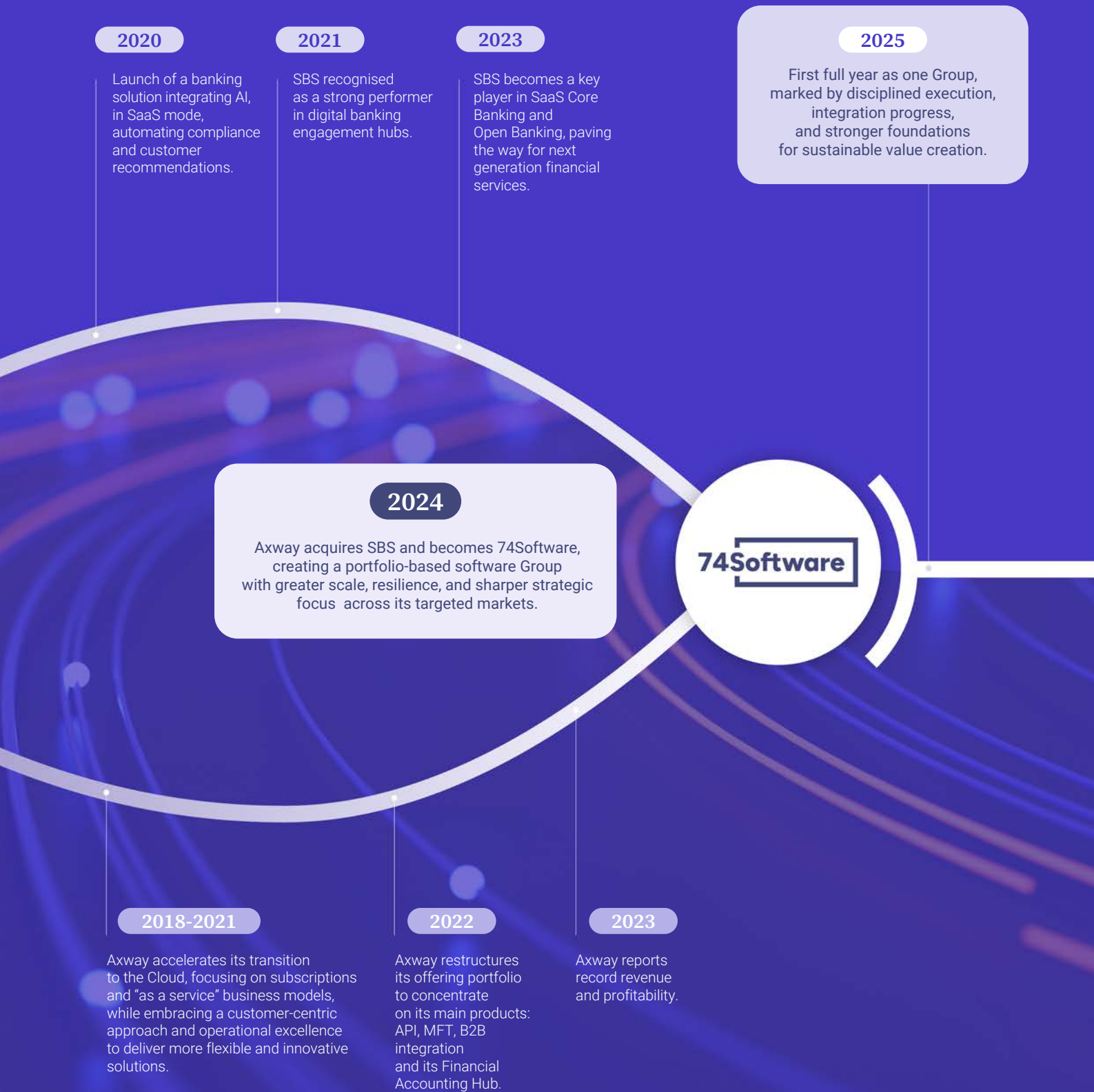
Launch of Sopra Banking Platform, an integrated solution which modernises banking systems and accelerates their digitalisation.

2016

SBS launches a cloud-native and modular banking platform, facilitating the scalability and agility of financial services.

2018

SBS is recognised as a leader in digital banking platforms, strengthening its global influence.



2020

Launch of a banking solution integrating AI, in SaaS mode, automating compliance and customer recommendations.

2021

SBS recognised as a strong performer in digital banking engagement hubs.

2023

SBS becomes a key player in SaaS Core Banking and Open Banking, paving the way for next generation financial services.

2025

First full year as one Group, marked by disciplined execution, integration progress, and stronger foundations for sustainable value creation.

2024

Axway acquires SBS and becomes 74Software, creating a portfolio-based software Group with greater scale, resilience, and sharper strategic focus across its targeted markets.



2018-2021

Axway accelerates its transition to the Cloud, focusing on subscriptions and "as a service" business models, while embracing a customer-centric approach and operational excellence to deliver more flexible and innovative solutions.

2022

Axway restructures its offering portfolio to concentrate on its main products: API, MFT, B2B integration and its Financial Accounting Hub.

2023

Axway reports record revenue and profitability.

Business Lines & Geographies

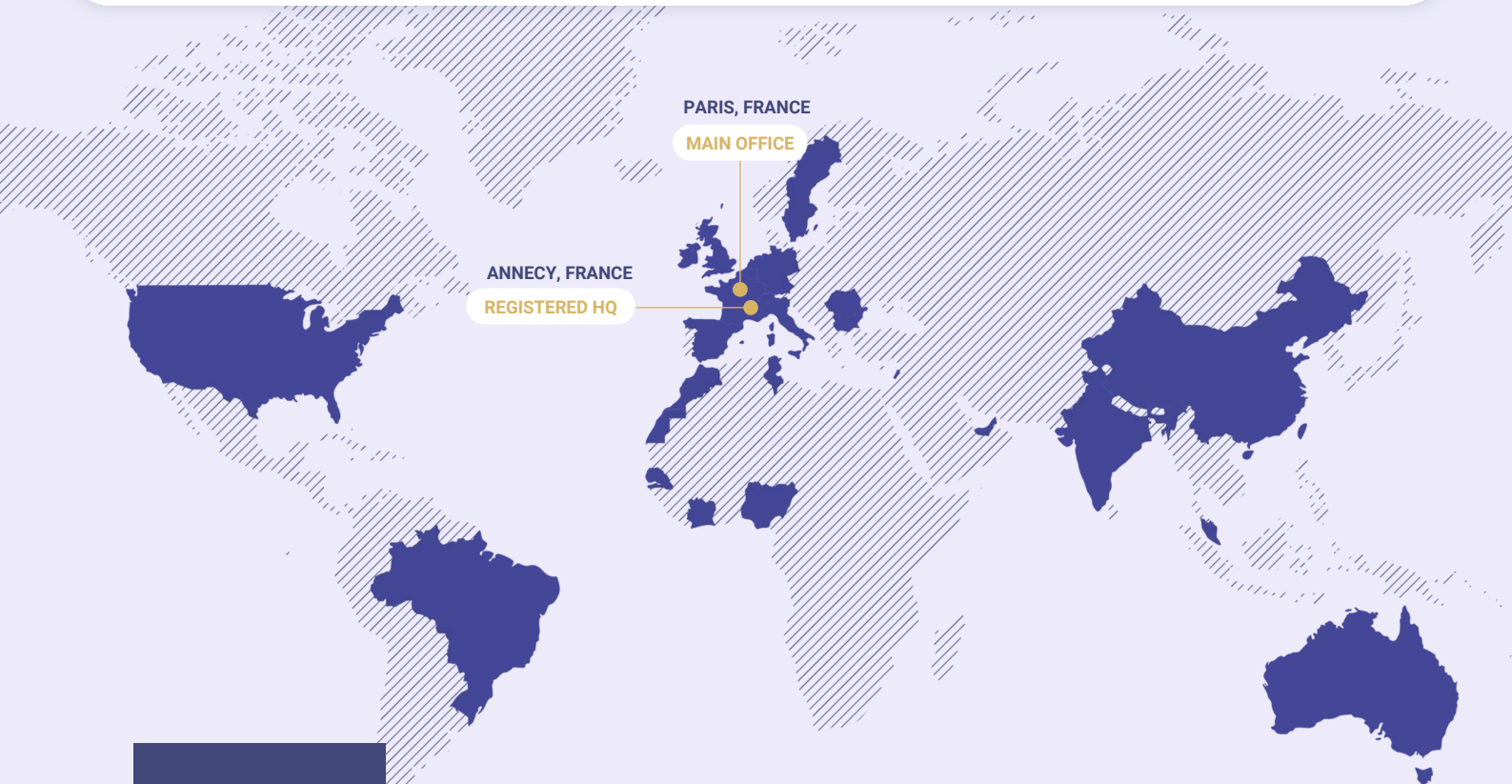
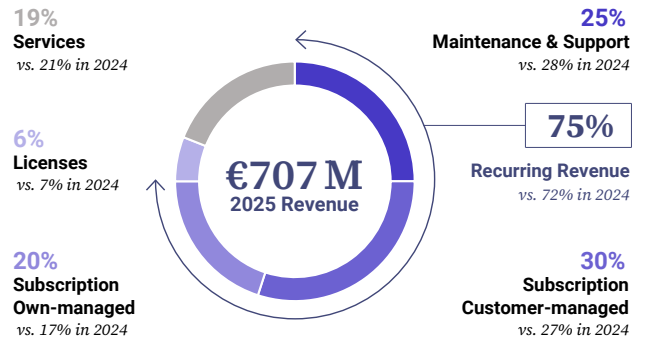
Our Mission

Empowering customers with secure, mission critical software and services to successfully operate and simplify their most complex business interactions.

REVENUE BY BRAND



REVENUE BY TYPE



Top 5
 FRENCH ENTERPRISE
 SOFTWARE PROVIDER
 TOP 250
 NUMEUM – EY 2025

26
 LOCATIONS

4,571
 EMPLOYEES

>12,000
 CUSTOMERS

DISTRIBUTION
 IN
>100
 COUNTRIES

Products & Customers

Our Software Portfolio

Managed File Transfer (MFT)

Managing the largest critical data streams flexibly and securely in accordance with compliance policies, ensuring seamless integration and robust protection of sensitive information.

B2B integration

Exchanging electronic data between companies, optimising business and logistics processes to improve collaboration and streamline operations.

API Management (APIM)

Managing API adoption by providing a universal platform to unify software infrastructures, streamline analysis, and accelerate the deployment of innovative digital services.

Specialised products

Ensuring visibility, intelligence and security across the entire digital ecosystem by optimising operating performance and costs.

Integrated banking products

Fully integrated banking processing platforms that are leaders in their markets, optimising transactions by offering comprehensive transaction, account, compliance and risk management solutions.

Financing products

Products to support the full lending lifecycle from origination to servicing in niche markets such as wholesale auto financing or mortgages.

Modular banking products

An innovative and composable SaaS banking platform to address the needs of Tier 2 to Tier 4 banks with modular solutions covering front-to-back functionality in retail banking.

Banking components

A large catalogue of components to address the needs of discerning bank customers with point solutions across the payments, lending and processing space.



AXWAY RECOGNITIONS

- Gartner® Magic Quadrant™ for API Management
7 October 2025
- G2 Reports: API, B2B & MFT
Winter 2025
- The Forrester Wave™: API Management Software
Q3 2024 – 1 July 2024
- IDC MarketScape: Worldwide Business-to-Business Middleware
2024 Vendor Assessment – December 2024



SBS RECOGNITIONS

- IDC FinTech Rankings 2025 Top 50
2025
- QKS Group – Leader & Emerging Innovator – Spark Matrix: Retail & Commercial Loan Origination Systems
2025
- Chartis Research – Leader RiskTech Regulatory Reporting Solutions Quadrant
2025
- NelsonHall – Leader GenAI & Process Automation in Banking
2025

Our Customers

THROUGH ITS BRANDS, 74SOFTWARE SUPPORTS ITS CUSTOMERS ACROSS ALL ACTIVITY SECTORS



Financial Services



Manufacturing



Retail



Public sector



Transport & Logistics



Healthcare

Customer satisfaction
as a company value

NET PROMOTER SCORE

38

SBS (+31 points)
Turnaround in customer
perception underway

55

AXWAY (+3 points)
Sustained leadership-level
customer advocacy

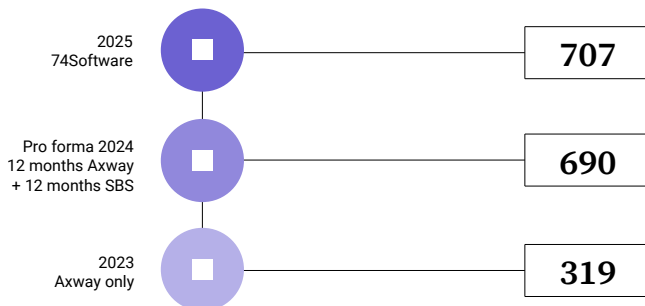
Operating Indicators

Financial Performance

	KPI	2025 ACTUALS	2026 GUIDANCE
GROWTH	Organic revenue growth	+3.8% to €707 M	3% to 5% organic growth
PROFITABILITY	Profit on operating activity	15.2% of revenue	15% to 17% of revenue
CASH GENERATION	Unlevered FCF/Revenue	11.4% of revenue	≈10%
DELEVERAGING	Net debt/EBITDA	1.92x	≈1.5x

REVENUE

(in millions of euros)



Product revenue

€576 M
up 7.2% from 2024



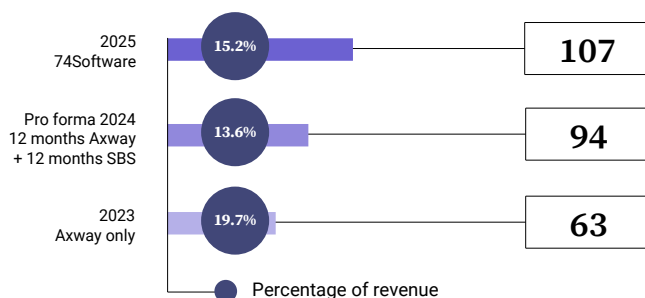
ARR (Annual Recurring Revenue)

€273 M (Axway)
up 11.8% from 2024

€244 M (SBS)
up 8.9% from 2024

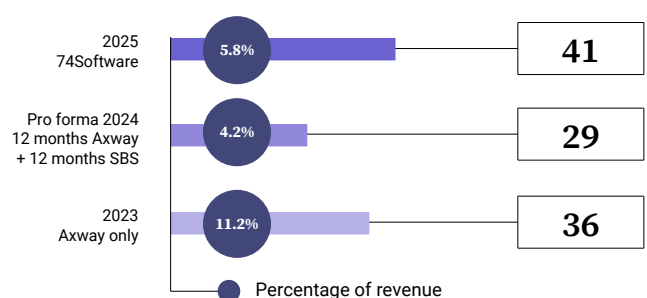
PROFIT ON OPERATING ACTIVITIES

(in millions of euros)



NET PROFIT

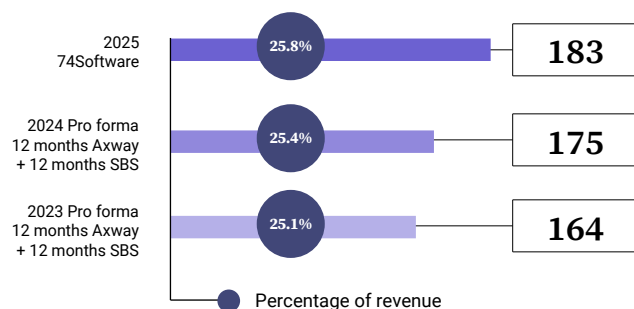
(in millions of euros)



Investments

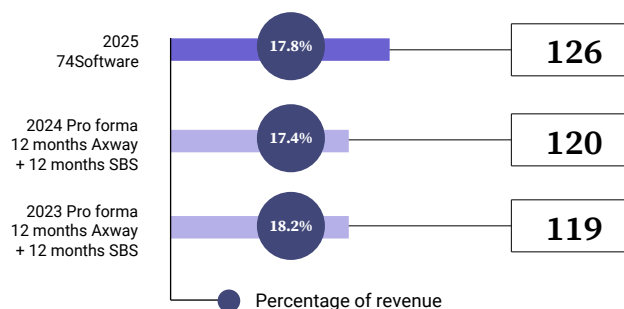
RESEARCH & DEVELOPMENT

(in millions of euros)



SALES & MARKETING

(in millions of euros)



Balance Sheet



NET DEBT

€193 M

vs. €250 M
at 31/12/2024



EQUITY

€554 M

vs. €532 M
at 31/12/2024



CASH & EQUIVALENTS

€49 M

vs. €41 M
at 31/12/2024

Capital Allocation Framework

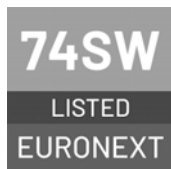
- Disciplined approach aimed at preserving balance sheet strength and maintaining long-term strategic flexibility.
- Selective M&A pursued on the basis of strategic fit, value creation potential and rigorous return criteria.
- Buybacks and dividends considered in light of capital requirements, market conditions and overall priorities.

Mid-term Ambitions

- By 2028, 74Software aims to achieve revenue close to **€800 M** and a margin on operating activities around **20%**.
- Over the mid-term, including selective and disciplined acquisitions, 74Software maintains its ambition to reach **€1 billion** in revenue.

Stock Market & Share Capital

Stock Market Profile



Euronext Paris Compartment B

- Bloomberg: 74SW:FP
- Reuters: 74SW.PA
- Market capitalisation at 31/12/2025: €1,234 M

Main Euronext Indices

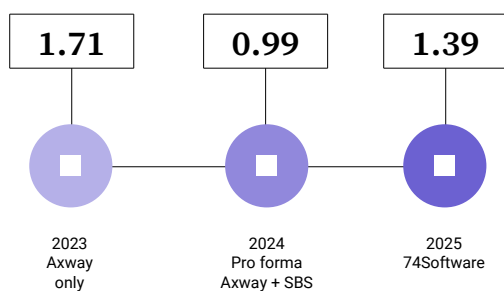
- CAC Technology
- Euronext Tech Croissance
- Euronext PEA-PME 150
- Euronext Tech Leaders

Eligibility

- SRD
- PEA
- PEA-PME

BASIC EARNINGS PER SHARE

(in euros)

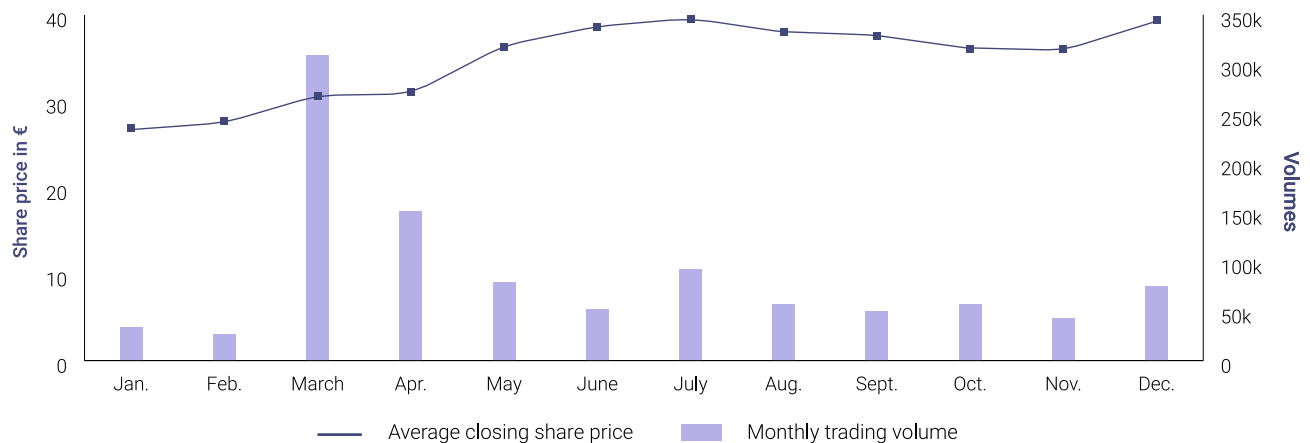


HISTORICAL SHARE PRICE PERFORMANCE

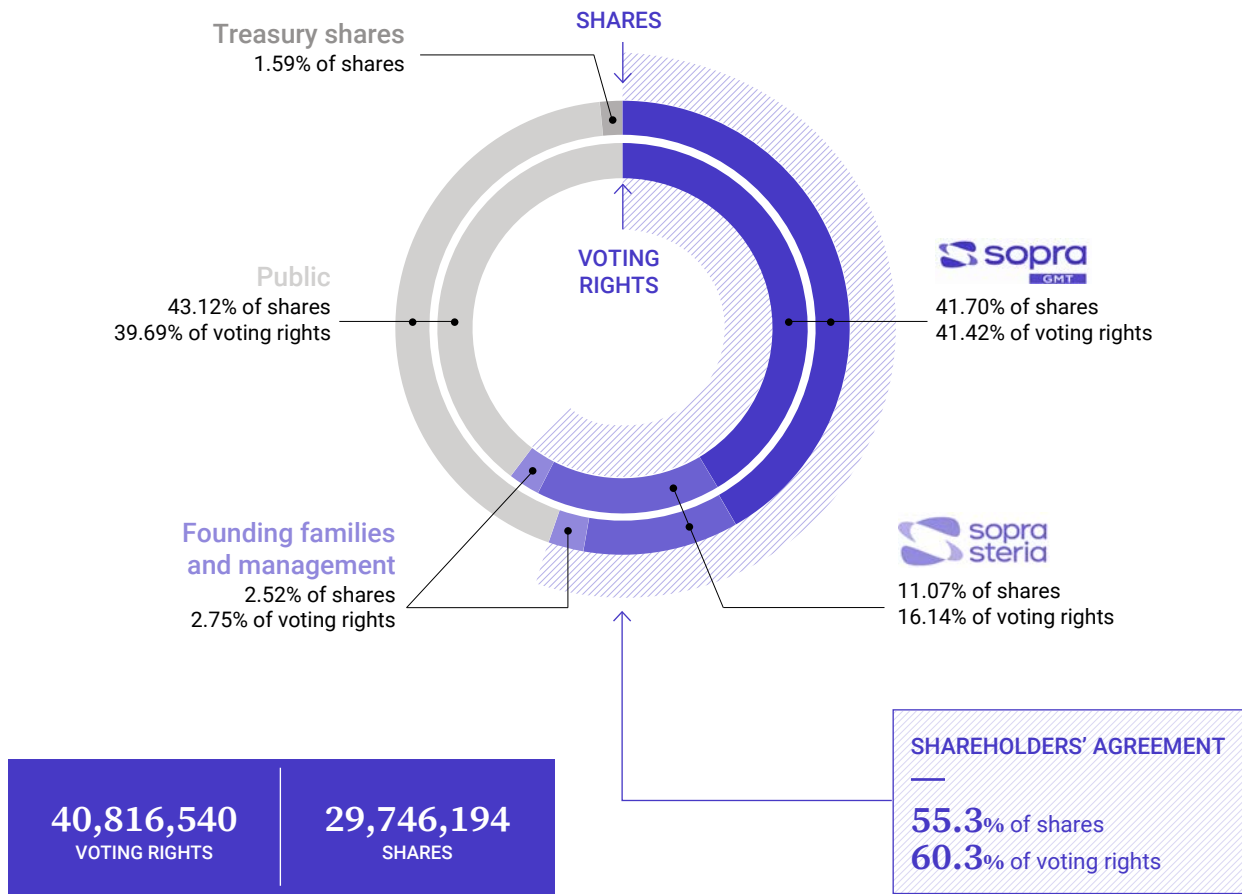
as of December 31, 2025

Period	CHANGE	HIGH	LOW
1 YEAR	+50.4%	44.80	27.10
3 YEARS	+181.0%	44.80	17.30
5 YEARS	+73.3%	44.80	13.44
10 YEARS	+91.8%	44.80	8.66

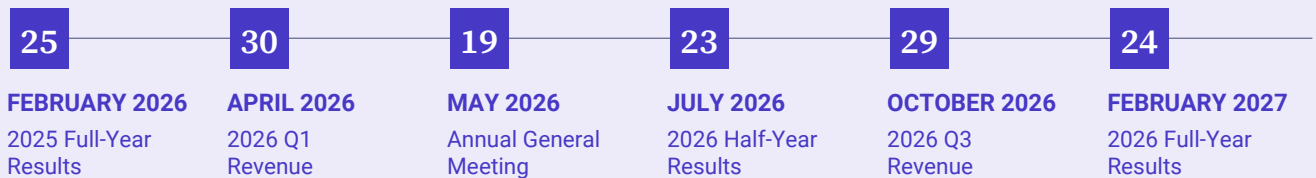
SHARE PRICE AND MONTHLY TRADING VOLUMES IN 2025



Share Ownership at 31 December 2025



2026 Financial Calendar



SHAREHOLDER DIALOGUE

A dedicated team and website
→ 74software.com/investor-relations

Constant straightforward dialogue
→ investorrelations@74software.com

Get the latest 74Software IR updates in your inbox by subscribing to our mailing list [here](#).

Governance

74Software's governance is founded on the sharing of powers between the Board of Directors and the Executive Committee, in accordance with the recommendations of the Middlednext Code.

Board of Directors

11
members












4
nationalities

40%
women*

6
meetings

97%
attendance

* The proportion of women on the Board of Directors is calculated excluding the Board Observer.

		Age	Nationality	Independent Director	Board Observer	Number of offices in other listed companies	Audit Committee	Appointments, Governance and Corporate Responsibility Committee	Compensation Committee	Expiry date of term of office (GM date)	Number of shares held personally
PIERRE PASQUIER		90	FR			1	M			2027	0
KATHLEEN CLARK		58	US/FR			1	P	M		2027	9,587
PIERRE-YVES COMMANAY		60	FR			0	M	M		2026	4,856
NICOLE-CLAUDE DUPLESSIX		66	FR			0		M		2029	2,166
EMMA FERNANDEZ		62	ESP	I		1	M	P		2027	0
MICHAEL GOLLNER		67	US/UK		C	1		C		2029	5,100
DOMINIQUE ILLIEN		72	FR	I		0	P			2028	82,500
YANN METZ-PASQUIER		37	FR/US			0	M			2026	184,960
OLIVIER PLACCA		57	FR	I		0		M		2029	0
PATRICK RENOUVIN		66	FR	I		0	M	M		2027	0
MARIE-HÉLÈNE RIGAL		55	FR			1	M			2026	0

C Board Observer **I** Independent **P** Chairwoman/Chairman **M** Member



82%

Knowledge of the software publishing business



55%

Knowledge of the financial services sector



36%

Entrepreneurial experience



55%

Finance, control & risk management expertise



45%

Finance, control & risk management knowledge



73%

Human resources & employee relations



36%

Environmental & societal challenges



91%

International dimension










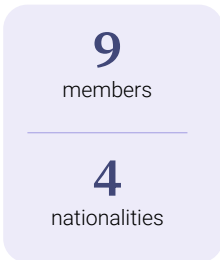
Activities of the Board of Directors and its Committees

MAIN TOPICS COVERED BY THE BOARD OF DIRECTORS IN 2025

- Strategy and the corporate project;
- Acquisition and disposal operations;
- 2025 budget and major guidelines;
- Approval of the financial statements for the year ended 31 December 2024;
- Approval of the interim financial statements for the first half of 2025;
- Approval of forward-looking financial and management information documents;
- Quarterly results and related financial reports;
- Workplace and wage equality;
- Social and environmental responsibility objectives;
- Composition of the Board and its Committees;
- Assessment of the Board of Directors' activities;
- Share capital increase;
- More in-depth implementation of the ethics and anti-corruption internal systems;
- Qualification of directors as independent;
- Company officer compensation;
- Members of the Board compensation;
- Grant of free shares to Company employees;
- Analysis of the minority shareholders' vote at the 2025 General Meeting;
- Monitoring of legal and regulatory developments: Rixain Law, CSRD Directive, pack Omnibus, DORA Regulation, Attractiveness Law.



Executive Committee

 PATRICK DONOVAN Chief Executive Officer United States – France	 ÉRIC BIERRY Deputy Chief Executive Officer Chief Executive Officer SBS France	 ROLAND ROYER Chief Executive Officer Axway France	 TOBIAS UNGER Chief Financial Officer Switzerland	 JULIA SIEPMANN Chief Human Resources Officer United Kingdom
 XAVIER REBEUF Chief R&D Operations France	 PAUL FRENCH Chief of Staff United States	 PHILIPPE BUISSON Chief of Integration and Secretary France	 YANN METZ-PASQUIER Chief Strategy Officer France	 <p>9 members</p> <hr/> <p>4 nationalities</p>

Corporate Responsibility

74Software, a responsible and committed company.

PRINCIPLES

GOVERNANCE

EXTERNAL EVALUATION

CERTIFICATIONS⁽³⁾

(1) [74Software's EcoVadis Recognition Page](#)
 (2) The rating was conducted in January 2025.
 (3) The exact scope of the products, services, and processes covered by these certifications for the Axway and SBS brands is available upon request.

● Axway ● SBS

2026 Orientations

SOCIAL

- Promote employee well-being and work-life balance
- Advance diversity and increase the representation of women in the workforce
- Invest in training and skills development programmes

ENVIRONMENT

- Advance the implementation of science-based emissions-reduction targets aligned with a 1.5°C scenario
- Develop and formalise the Group's climate change mitigation transition plan
- Reduce the environmental impact of our products and solutions by continuing our eco-design efforts and environmental impact assessments

CUSTOMERS & USERS

- Invest constantly in our products and guarantee their relevance and performance
- Continue to measure and improve customer satisfaction through NPS surveys and customer success management initiatives
- Maintain first-class data protection and cybersecurity measures

BUSINESS CONDUCT

- Continue aligning business conduct practices and compliance mechanisms across the Group
- Strengthen compliance policies and mechanisms for reporting ethical concerns
- Promote responsible purchasing practices

Social

WORKFORCE



- Americas 8%
- Europe 65%
- Asia – Pacific 18%
- Africa – Middle East 9%

30%
women
vs. 30% in 2024

99%
permanent
contracts

TALENT DEVELOPMENT

50,285
training hours

99%
of employees
completed a talent
review in 2025

11
training hours
per employee

42%
of employees
trained in information security
in 2025



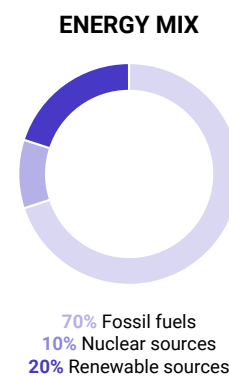
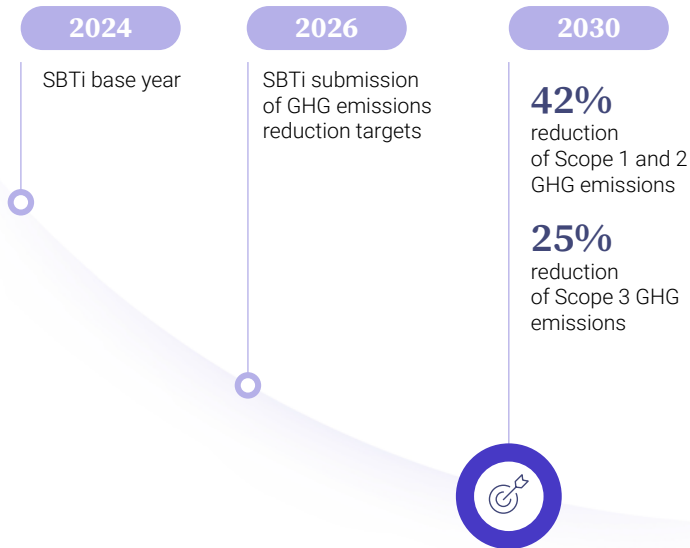
EMPLOYEE ENGAGEMENT

88%
survey participation
rate

66%
engagement score

SBTi Targets

Key Climate Metrics



Customers & Users

CUSTOMER EXPERIENCE

Optimise the customer experience and analyse journeys to consistently enhance satisfaction through ongoing improvement

DATA AND TRANSACTION SECURITY

Ensure the security of data and transactions for transparent and efficient business interactions

FINANCIAL INCLUSION

Facilitate access to financial services through digital solutions to reduce inequalities and promote autonomy

DIGITAL ACCESSIBILITY

Incorporate accessibility principles into digital solutions to better support users, including persons with disabilities

Business Conduct

74SOFTWARE AS A TRUSTED PARTNER

Strong Practices:

- Ethical training, including anti-corruption measures and data protection
- Strict compliance with international laws and regulations

Promoting a Positive and Ethical Corporate Culture:

- A publicly disclosed Code of Ethics, committing the entire company
- Commitment to fair and sustainable purchasing practices
- Anti-corruption measures and a whistleblowing system accessible to all stakeholders



Business Model

SR

Our Mission

A trusted, independent enterprise software provider that sustainably grows enduring value by delivering successful outcomes for its customers, opportunities for its employees and returns for its shareholders.

STRENGTHS >

Financial Profile

- Track record of growth, improving margins and cash generation
- Solid balance sheet profile and continued deleveraging
- Financial flexibility supporting long-term strategic priorities

Governance

- Independent corporate project supported by long-term reference shareholders
- Clear governance structure involving both the Board of Directors and the Executive Committee
- Matrix-based management structure by region and major product line

Technology & Products

- Technology strategy supported by an agile and efficient product portfolio
- Recognized technology leadership in mission-critical software markets
- Continued investment in R&D and innovation
- 20 technology patents

Customers & Partners

- More than 12,000 customers worldwide
- Commercial presence in over 100 countries
- Global partner network supporting reach and execution

People

- 4,571 employees across 26 countries
- International teams with diverse backgrounds, profiles and cultures

Corporate Responsibility

- Key performance indicators integrated into the strategy and governance framework
- Social, societal and environmental ambitions embedded in the Group's approach and decision-making

OFFERINGS & CAPABILITIES >

PRODUCT PORTFOLIO



- Managed File Transfer (MFT)
- API Management (APIM)
- B2B Integration
- Specialised products



- Integrated banking products
- Modular banking products
- Financing products
- Banking components

INNOVATION

- Sustained investment in research and development

PUBLISHING

- Software development
- Architecture
- Quality assurance and testing

PORTFOLIO DEVELOPMENT

- Selective portfolio expansion
- Make-or-Buy analysis

INFRASTRUCTURE & SECURITY

- SaaS & Cloud
- On-premises deployment
- Data and transactions security







GO-TO-MARKET

- Marketing and brands
- Sales and services
- Customer Success Management
- Subscriptions and renewals



EMPLOYEE ENGAGEMENT

MARKET TRENDS

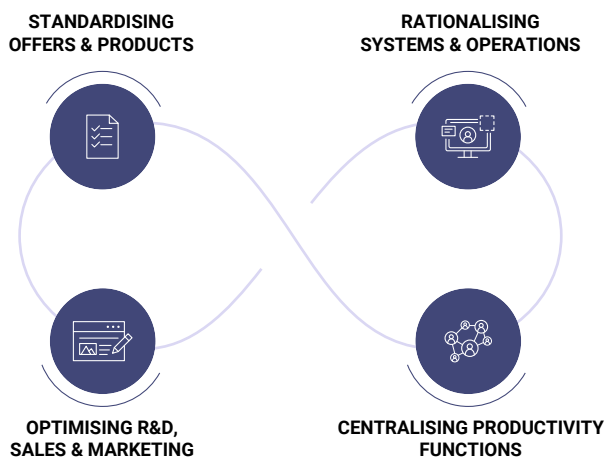
-  Artificial Intelligence & Automation
-  Cloud & Multi-Cloud Migration
-  Data Privacy & Sovereignty
-  Cybersecurity & Regulatory Compliance
-  Open Banking & Financial Services
-  Collaborative Ecosystems

STRATEGY >

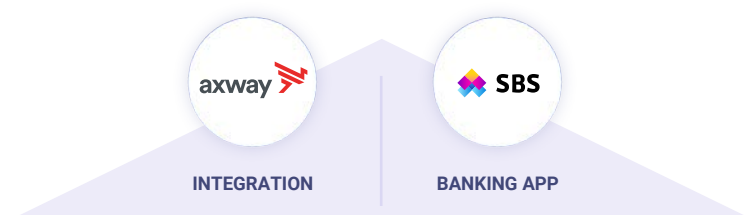
74Software's success pillars



... and the focus it requires,



to build a robust Software House



CUSTOMER SATISFACTION >

VALUE CREATION

Customers

- Best-in-class products recognized by market analysts
- Flexible contractual and technological models
- Strong customer satisfaction, with an NPS up by 3 points for Axway and 31 points for SBS

Partners

- Strategic, technological and innovation partnerships
- Solid partner satisfaction, with NPS at 65 (Axway only)

Employees

- Engaged teams, with an employee engagement score of 66%
- Workplace well-being, job stability and flexible ways of working
- More than 50,000 training hours delivered across the Group
- Open company-wide dialogue fostered through regular forums led by top management
- Employee share ownership representing 2.6% of share capital
- Continued commitment to diversity and the prevention of discrimination

Suppliers

- Supplier & Partner Charter
- Ethics Charter and related tools supporting responsible business practices

Shareholders

- Euronext Paris listing and Middenext Governance Code
- Ethifinance ESG Ratings score of 68/100
- Shareholder dialogue supported by transparent and accessible information

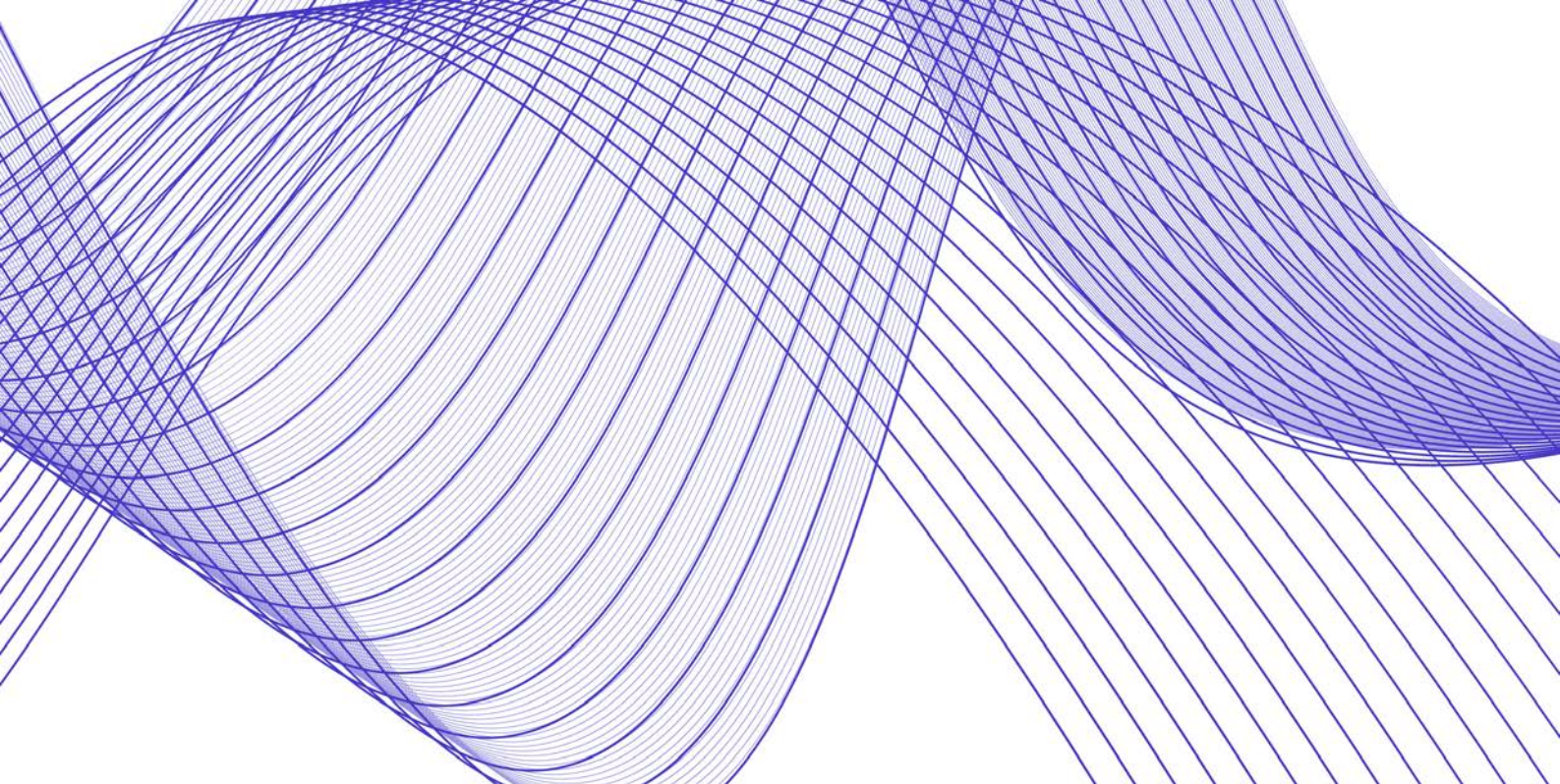
Civil Society

- Continued efforts to better measure and reduce greenhouse gas emissions
- Commitment to the UN Global Compact
- Support for financial inclusion and digital accessibility

02

Sustainability Statement

2.1	General Information (ESRS 2)	22	2.3	Resource Use and Circular Economy (ESRS E5)	52
2.1.1	Basis for preparation	22	2.3.1	Resource use and circular economy IROs (E5)	52
2.1.2	Entity activities and business model	23	2.3.2	Policies related to resource use and circular economy (E5-1)	53
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Introduction

This chapter presents, for 2025, 74Software's material sustainability issues and identified risks, in accordance with:

- the obligations of the European Directive 2022/2464/EU, known as the Corporate Sustainability Reporting Directive (CSRD), which replaces and expands the requirements of Directive 2014/95/EU on the disclosure of non-financial information, and aims to harmonise and strengthen the non-financial reporting of companies;
- article L. 225-102-1 of the French Commercial Code concerning the vigilance plan; and
- the European Regulation 2020/852 of 18 June 2020 (the "Taxonomy Regulation"), which establishes a framework to facilitate sustainable investments within the European Union.

74Software is also a signatory of the United Nations Global Compact, and as such discloses annually the progress achieved against the principles contained in the Global Compact.

This chapter forms an integral part of the French-language Rapport de Gestion (Management Report) and has been the subject of a certification by the statutory auditors authorised to verify the sustainability information in accordance with the requirements of the CSRD. Their report is presented in Section 2.8 "Report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852".

2.1 General Information (ESRS 2) AFR SR

The European Sustainability Reporting Standards (ESRS) provide a comprehensive framework for sustainability disclosures, applicable across all sectors and sustainability topics. ESRS 2 highlights the importance of transparency, materiality assessment, and stakeholder engagement. It requires 74Software to disclose its sustainability governance, strategy, and the management of impacts, risks, and opportunities. The standard also integrates minimum disclosure requirements for policies, actions, metrics, and targets.

However, the Group faces several uncertainties and limitations during this year of implementing the CSRD regulation. The interpretation of the regulatory text and the modifications in terms of data collection, reporting accuracy, and resource allocation mean that 74Software still has areas requiring improvement to meet all reporting requirements.

2.1.1 Basis for preparation

74Software's sustainability report is prepared in accordance with ESRS guidelines. It outlines the scope of the value chain, the estimation methods used, and any changes from previous reporting periods. This approach ensures sustainability disclosures that are consistent, comparable, and reliable.

2.1.1.1 Basis for preparation (ESRS 2 BP-1)

The sustainability report of 74Software was prepared on a consolidated basis and, unless otherwise specifically mentioned, is aligned with the financial statements. The report complies with the European Sustainability Reporting Standards (ESRS), Article L. 233-28-4 of the Commercial Code, and the Taxonomy Regulation. The carbon footprint was calculated using the GHG Protocol methodology.

The data in this report was selected based on a double materiality analysis, involving stakeholders through surveys, interviews, and workshops. Further details regarding this process can be found in Section 2.1.4.1 of this Chapter.

The sustainability report covers the Group's upstream and downstream value chain, focusing on stakeholders with whom 74Software has direct relationships and can therefore directly influence. This includes both procurement and sales aspects. For 74Software, the key elements are outlined in the Company's operations and value chain description in Section 2.1.2.1 of this Chapter.

74Software has not used the options to omit specific information related to intellectual property, know-how, or the results of innovation, nor has it utilised the exemption from disclosure of impending developments or matters currently under negotiation.

2.1.1.2 Disclosures in relation to specific circumstances (ESRS 2 BP-2)

74Software has not deviated from the time horizons defined by ESRS 1 Section 6.4, which include short-term (defined as the period adopted by 74Software as the reporting period in its financial statements, namely one calendar year), medium-term (extending from the end of the short-term reporting period up to five years), and long-term (periods extending beyond five years).

In terms of estimations, the only ones made relate to the carbon footprint assessment, as detailed in the environmental section. No social or governance data have been estimated. Any estimation, assumption, approximation, or judgment is clearly explained in the relevant section.

Changes in the preparation or presentation of sustainability information compared to the previous period result from the need to comply with the CSRD regulation and the inclusion of SBS in the consolidation scope, following the acquisition completed by Axway on 2 September 2024.

74Software is publishing the environmental footprint of the Group's downstream activities, particularly the greenhouse gas

emissions resulting from 74Software's customers' use of its products. Given that there is currently no common methodology and there are limitations in available data, including cloud usage, the variability in customers' energy use and challenges in tracking introduce a moderate degree of uncertainty, potentially leading to deviations from actual values. Given the difficulty of obtaining detailed, client-specific information on the impact of using 74Software products, the Company uses 74Software's technical data to model the on-premises use of its software by clients.

74Software's sustainability strategy includes reducing the environmental impact of its products, integrating eco-design practices into the development of its products. Starting in 2025, 74Software is investing in gathering more accurate data from its products, which is expected to improve downstream emissions reporting accuracy over the next two years.

Certain information is not available and is listed in 2.1.5 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement (ESRS 2 IRO-2).

References have been incorporated into the following disclosure requirement: ESRS 2 SBM-1 paragraph 42b (Introduction, Business Model).

2.1.2 Entity activities and business model

2.1.2.1 Entity activities and business model (ESRS 2 SBM-1)

74Software is a global portfolio company, registered in Annecy and headquartered in Paris, France, with a consolidated workforce of 4,571 across 26 countries. The Company's strategy is to establish itself as a leading independent software provider by cultivating long-term relationships with stakeholders and delivering sustained value to clients, employees, and shareholders. It serves large enterprises and financial institutions worldwide, and its products and services are available without geographic restrictions. An overview of the Company's business model and workforce breakdown is available in the Company profile.

The portfolio covers managed file transfer (MFT), B2B integration, API management, integration platform as a service (iPaaS), financial accounting hubs, and specialised banking and financial software. These solutions are engineered for reliability, security, and longevity, enabling customers to streamline data flows, improve interoperability, reduce manual processes, and lower total cost of ownership.

Revenue is generated through software subscriptions, licences on site support, consulting, development, training, and related services. The Company provides segment reporting in compliance with IFRS 8, ensuring that revenue information aligns with IFRS 8 reconciliation requirements.

Value creation relies on two primary inputs: skilled professionals and advanced technology infrastructure. Talent is sourced through rigorous recruitment and supported by continuous training and development to sustain cutting-edge expertise aligned with industry trends. Technology capabilities combine proprietary development tools, strategic partnerships with technology providers, and ongoing research and development, integrating modern tools and methodologies to remain at the forefront of technological advancement.

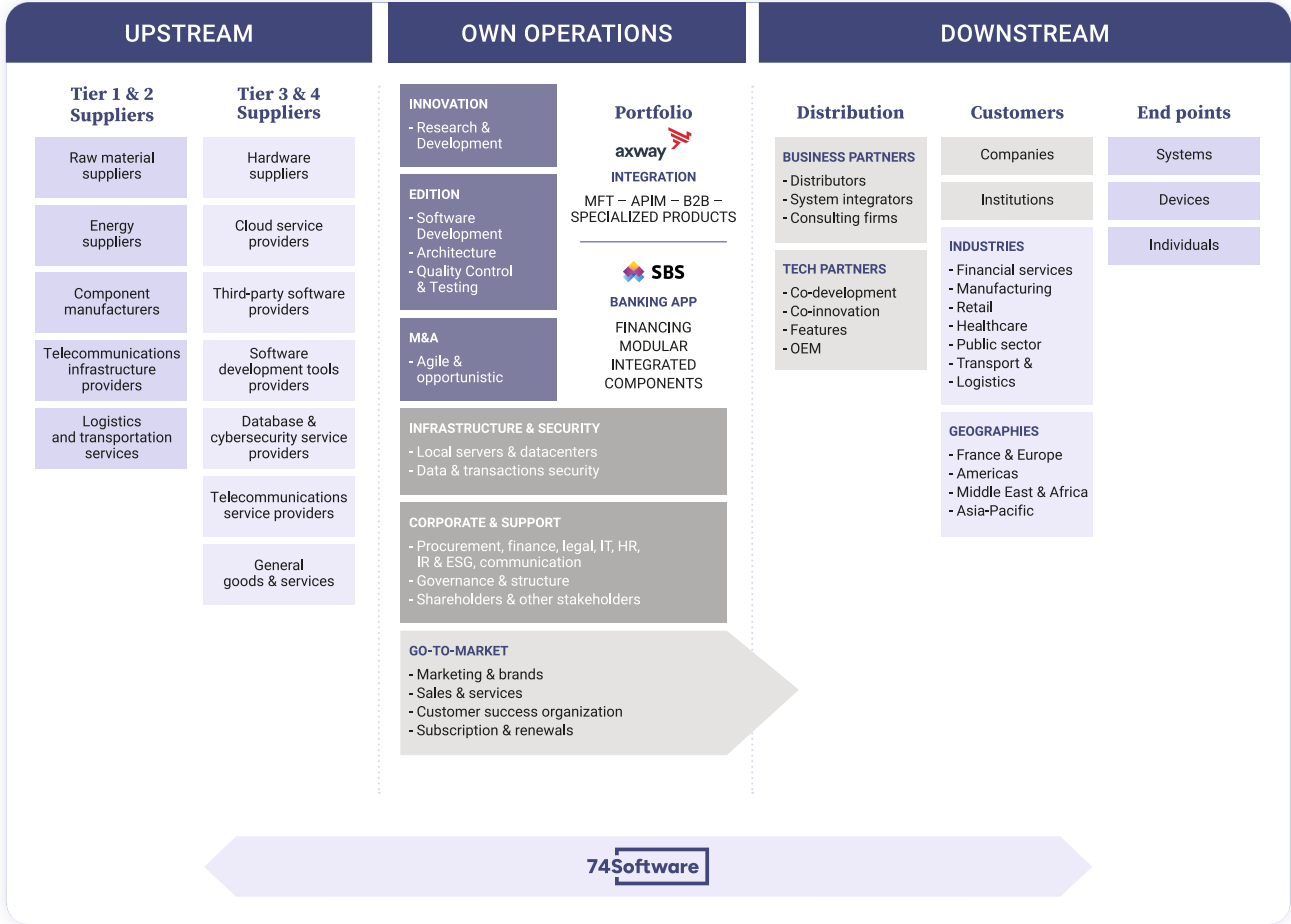
Data security is a top priority. The Company maintains robust measures to protect sensitive information and ensure compliance with applicable regulations across jurisdictions. The supply chain is managed through a trusted network of suppliers and partners selected for quality, reliability, and sustainability performance; long-term relationships are fostered, with a preference for suppliers using renewable energy and adherence to stringent environmental and ethical standards.

The Company prioritises carbon footprint reduction, resource efficiency, and the integration of sustainable practices into product development.

74Software does not operate in the fossil fuel, chemical production, controversial weapons, or tobacco industries. Its sustainability objectives focus on maximising social and societal value while minimising environmental impact, in line with the principles of the UN Global Compact. Accountability is reinforced through regular independent assessments and complemented by transparent ESG and CSR reporting, including CDP, EcoVadis, Ethifinance ESG Ratings, ISS ESG, and others.

The Company's products contribute to customer efficiency and sustainability outcomes by optimising resource usage, enabling cloud migration to data centres with increasing shares of renewable energy and efficient cooling technologies, and reducing redundancy through enhanced integration and automation across MFT, API management, B2B integration, and iPaaS

capabilities. Solutions are engineered for long-term use, reducing the need for frequent reinvestment and helping to limit electronic waste. Energy-efficient design and alignment with environmental regulations enable clients to meet evolving sustainability expectations without compromising performance or reliability.



2.1.2.2 Interests and views of stakeholders (ESRS 2 SBM-2)

74Software engages a broad stakeholder universe and integrates their perspectives into strategy and operations. Upstream stakeholders include first- and second-tier suppliers of raw materials, energy, hardware, software, cloud services, third-party applications, and cybersecurity providers. Downstream stakeholders comprise enterprise and institutional customers, distribution partners, technology innovation partners, OEMs, and end-users

across systems and devices. Civil society stakeholders include media, NGOs, academia, local communities, and individuals. Within the economic sphere, 74Software maintains active relationships with customers, suppliers, employees and their representatives, investors, shareholders, auditors, rating agencies, business partners, and public and regulatory authorities. By sustaining collaborative, transparent relationships across this ecosystem, the Company ensures that sustainability practices remain relevant and impactful throughout the value chain.



Stakeholder engagement is systematic and proactive, incorporating insights into strategic development. Interests are monitored through structured methods: employee engagement via annual surveys informing action plans, and customer satisfaction through regular NPS surveys. Feedback drives tangible improvements, such as integrating sustainability priorities into strategic planning.

74Software has committed to initiatives like science-based decarbonisation targets and enhanced social programmes, scheduled for rollout over the next years. These actions reinforce transparency, sustainability, and continuous improvement, fostering trust, collaboration, and mutual benefit across all stakeholder groups.

The table below lists 74Software’s main stakeholders:

Stakeholders	Engagement type	Details
Employees	<ul style="list-style-type: none"> ■ Town hall meetings ■ Employee engagement surveys ■ Sustainability trainings and programmes 	The entire Group’s headcount is covered by the mentioned initiatives.
Customers	<ul style="list-style-type: none"> ■ NPS ■ Feedback sessions ■ Customer satisfaction surveys 	74Software primary customers include large enterprises and financial institution.
Suppliers & Partners	<ul style="list-style-type: none"> ■ Contracts ■ ESG questionnaires ■ Suppliers & Partners Charter 	First level suppliers for which 74Software is a direct customer, particularly those committed to sustainable practices.
Investors	<ul style="list-style-type: none"> ■ Annual general meetings ■ Investor conferences & roadshows ■ Sustainability reporting 	Institutional and individual investors with a growing interest in sustainable business practices.
Regulators	<ul style="list-style-type: none"> ■ Compliance audits ■ Regular reporting 	Government bodies and industry regulators focused on environmental and safety standards.
Local Communities	<ul style="list-style-type: none"> ■ Community outreach programmes ■ Academic engagement 	Communities where our offices are located.

74Software is committed to meeting stakeholder expectations through ongoing engagement, public ESG and CSR reporting, and participation in annual CSR assessments.

74Software contributes to the Climate Disclosure Project (CDP) and submits Communication on Progress (COP) reports under the UN Global Compact. Adherence to the GHG Protocol ensures compliance with an internationally recognised framework for measuring and reducing greenhouse gas (GHG) emissions. The United Nations’ Sustainable Development Goals (SDGs) guide 74Software’s CSR initiatives.

Stakeholder insights are analysed through the Company’s double materiality assessment and embedded in due-diligence and risk-management processes, ensuring actions align with stakeholder expectations and sustainability objectives.

The administrative, management, and supervisory bodies are regularly updated on stakeholder views regarding the Company’s sustainability-related impacts, through structured reporting and discussions, as detailed in Section 2.1.3.1 “The role of the administrative, management, and supervisory bodies (ESRS 2 GOV-1)”.

2.1.3 Sustainability governance

2.1.3.1 The role of the administrative, management, and supervisory bodies (ESRS 2 GOV-1)

Sustainability governance at 74Software is structured around the Board of Directors and the Executive Committee, in line with the Group's governance framework and the recommendations of the Middlenext Code of Corporate Governance. The CEO is accountable for the CSR strategy and results, while the Head of CSR provides day-to-day leadership and coordination.

The CEO reports on CSR quarterly and presents progress to the Board at least twice a year, either within the Nomination, Governance, and Corporate Responsibility Committee or the Audit Committee. The Board provides oversight of material impacts, risks and opportunities (IROs), approves related policies and targets, and conducts an annual review of the sustainability strategy to ensure alignment with long-term objectives. The Audit Committee oversees sustainability reporting, including audit matters and the sustainability report, and internal audit periodically reviews compliance with policies and controls.

The CSR Department reports directly to the CEO on a monthly basis and delivers regular presentations to the Board or its committees. CSR regulatory disclosures are subject to independent third-party assessment.

The Executive Committee translates strategy into operations, sets priorities, and oversees implementation across functions. The CEO, supported by the Deputy CEO and the Head of CSR, monitors delivery and escalates significant sustainability matters to the Board.

In 2025, the CSR function was reorganised at Group level under the leadership of the Group Chief Legal Officer, acting as Head of CSR, with responsibility across all 74Software entities. This reorganisation aimed to centralise CSR governance, strengthen

regulatory compliance, and better integrate CSR considerations into 74Software's core business activities.

In 2025, the Board comprises ten Directors, including four women, representing 40% of the Board, and four independent members, also accounting for 40%. There are no employee representatives on the Board.

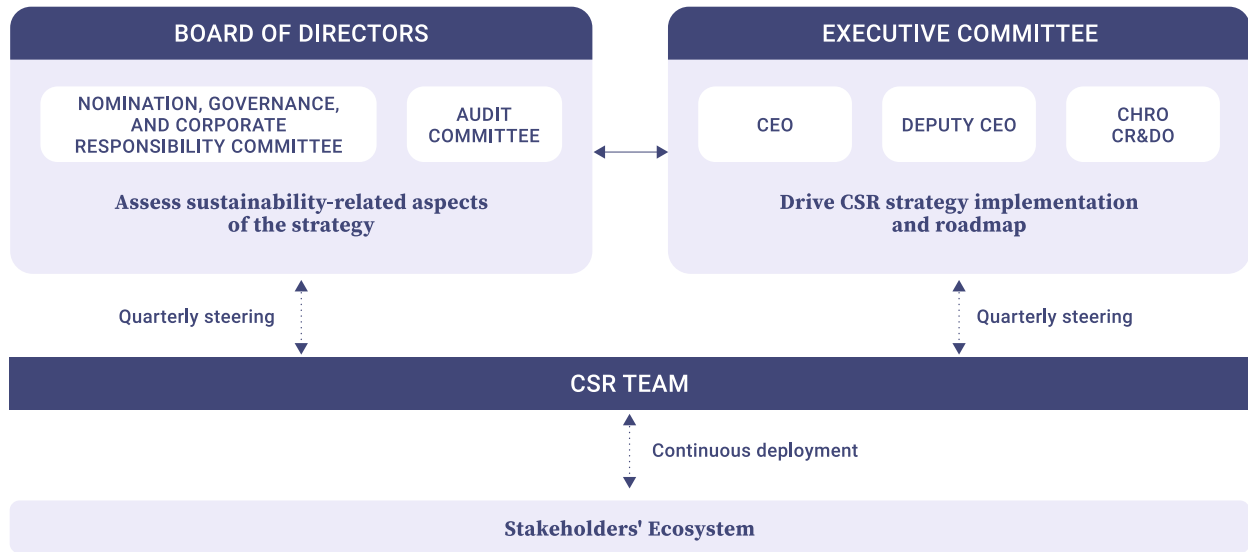
The members bring expertise across software publishing, financial services, entrepreneurship, finance, risk management, corporate social responsibility, human resources, social relations, environmental and societal issues, as well as international experience. Diversity is a key focus in the composition of the Board, ensuring a balance between independent and non-independent members while striving for gender equality. The Board also promotes multicultural diversity and a broad range of competencies to strengthen its governance and decision-making.

The Board's organisation and functioning are governed by Articles L.225-17 *et seq.* of the French Commercial Code and by Articles 14–21 and 23 of the Company's bylaws and internal regulations (available on the Company's website: <https://www.74software.com/bylaws-regulations-agreements>).

The Executive Committee comprises nine members, currently one woman, (11% female representation). 74Software is committed to improving gender diversity in executive leadership. Their CSR expertise spans environmental, social, and governance (ESG) topics. The environmental expertise referenced for Executive Committee members is primarily role-based, linked to responsibilities within the CSR governance framework (e.g., eco-design, green IT, sustainability strategy). They are committed to advancing initiatives that promote environmental responsibility and social equity within the Company. This includes implementing sustainable policies, supporting diversity and inclusion efforts, and ensuring transparent and accountable governance.

CSR Competencies represented in Executive Committee:

Name	CSR – Social	Environment	Business Conduct	Product Sustainability
Patrick DONOVAN	✓	✓	✓	
Éric BIERRY	✓	✓	✓	
Tobias UNGER	✓			
Philippe BUISSON	✓		✓	
Yann METZ-PASQUIER				
Paul FRENCH			✓	
Xavier REBEUF			✓	✓
Roland ROYER	✓		✓	
Julia SIEPMANN	✓		✓	



2.1.3.2 Information provided to and sustainability matters addressed by the 74Software’s administrative, management and supervisory bodies (ESRS 2 GOV-2)

The administrative, management, and supervisory bodies, along with their respective committees, receive quarterly updates from the CEO, on behalf of the Executive Committee, and at least twice a year from the CEO or the Head of CSR. Information provided to the Board of Directors addresses material sustainability topics and IROs, the corresponding policies and targets, KPI performance versus target pathway, and planned remediation measures. Where relevant, selected sustainability objectives are integrated into variable remuneration for the CEO, the deputy CEO and certain operational managers. The Board of Directors ensures that all material IROs are integrated into strategic decision-making and the management of risks and opportunities, reinforcing the Company’s commitment to sustainable and responsible growth.

In 2025, the key topics discussed by the Board of Directors included professional and salary equality, social and environmental responsibility objectives, the strengthening of internal ethics and anti-corruption systems, and compliance with the CSRD Directive, including the Double Materiality Assessment and the related material IROs.

2.1.3.3 Objectives and variable remuneration aligned with ESG (ESRS 2 GOV-3)

The Company links executive incentives to CSR objectives to ensure that its leaders remain focused on achieving these targets. This approach promotes sustainable practices across the Company. In line with this commitment, the remuneration of the CEO and the Deputy CEO is partially determined by non-financial criteria—both qualitative and quantitative – covering social and/or environmental aspects.

2.1.3.4 Statement on due diligence (ESRS 2 GOV-4)

The data in this report has been thoroughly verified by sustainability auditors, Mazars and Aca Nexia, appointed by the General Shareholders Meeting.

Throughout the preparation process, 74Software teams worked closely with the auditors to ensure full compliance with CSRD requirements. All quantitative and qualitative data underwent multiple checks and verification procedures, with particular focus on defining material IROs and meeting CSRD publication standards.

The audit included interviews and surveys with senior management and key stakeholders to validate the integrity of the information. The engagement letter, issued by the CEO, underscores the Company’s commitment to transparency and accountability.

Audit findings were presented and discussed in depth with the Board of Directors and its committees. These interactions confirm that the sustainability report accurately reflects 74Software’s due diligence and performance. The Company remains committed to continuously improving its sustainability reporting framework.

Core elements of Due Diligence	Paragraphs in the sustainability statement
Embedding due diligence in governance, strategy and business model	ESRS 2 – GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies ESRS 2 – GOV-3: Integration of sustainability-related performance in incentive schemes ESRS 2 – SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2 – GOV-2: Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies ESRS 2 – IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities ESRS 2 – MDR-P: Policies adopted to manage material sustainability matters ESRS 2 – SBM-2: Interests and views of stakeholders Topical ESRS: <ul style="list-style-type: none"> ■ SBM-2: Interests and views of stakeholders ■ MDR-P: How stakeholders' views are incorporated into policy
Identifying and assessing adverse impacts	ESRS 2 – IRO-1: Description of the processes to identify and assess material impacts, risks and opportunities ESRS 2 – SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model Topical ESRS: <ul style="list-style-type: none"> ■ SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
Taking actions to address those adverse impacts	ESRS 2 – MDR-A: Actions and resources in relation to material sustainability matters Topical ESRS: <ul style="list-style-type: none"> ■ The range of actions, including transition plans
Tracking the effectiveness of these efforts and communicating	ESRS 2 – MDR-M: Metrics in relation to material sustainability matters ESRS 2 – MDR-T: Tracking effectiveness of policies and actions through targets Topical ESRS: <ul style="list-style-type: none"> ■ Metrics and indicators section

2.1.3.5 Risk management and internal controls in terms of ESG reporting (ESRS 2 GOV-5)

Effective risk management and internal controls are crucial for accurate and reliable ESG reporting at 74Software. The central team collects ESG data from all levels of the Company, including central operations, country offices, and suppliers. This data is extracted from various management tools and systems, such as HR systems and other internal tools, or directly submitted by subsidiaries. The central CSR team is responsible for collecting, analysing, and verifying the data through consistency checks. The information is verified, supporting documentation is requested, and the data is adjusted according to the reporting period before consolidating it into comprehensive reports. This meticulous process ensures that the ESG data reported is accurate and reliable, reflecting the Company's commitment to transparency and accountability.

Furthermore, the governance structure overseeing ESG reporting at 74Software plays a crucial role in managing risks and internal controls. The central CSR team conducts audits and ensures the accuracy of the collected data. The CEO and the Board of Directors oversee this process, providing strategic direction and ensuring that ESG reporting aligns with the Company's sustainability goals. Relevant committees, such as the Nomination, Governance, and Corporate Responsibility Committee, play a key role in monitoring and guiding ESG initiatives.

In addition, the findings of the risk assessment and internal controls related to ESG reporting are periodically reported to the

Executive Committee. On a regular basis, and at least as part of the annual sustainability and Universal Registration Document reporting cycle, the central CSR team consolidates the results of ESG reporting risk assessments, including identified key risks, control weaknesses and remediation actions. These findings are reviewed by the Executive Committee and subsequently communicated to the Board of Directors.

Relevant Board committees, in particular the Nomination, Governance, and Corporate Responsibility Committee, are informed of these results through dedicated management reports and committee presentations, enabling them to exercise effective oversight of ESG-related risks, internal controls and reporting processes. Where necessary, significant issues may also be escalated on an ad-hoc basis, in line with the Company's governance framework.

This robust governance framework ensures that 74Software's ESG reporting is not only accurate but also aligned with the Company's broader strategic objectives.

In 2025, the CSR team conducted a comprehensive reassessment of ESG reporting, including a comparative analysis of key indicators against the previous year and strengthened consistency checks. These measures further enhance the reliability of ESG disclosures and support continuous improvement. Risks related to digital accessibility, data privacy, and whistleblower protection were reassessed at a higher level than in previous years, following a renewed internal consultation and a deeper analysis of emerging vulnerabilities and operational practices. The assessment confirmed that no additional material risks emerged beyond those already monitored.

2.1.4 Impacts, Risks, and Opportunities management (IRO)

2.1.4.1 Identification of the IROs and Double Materiality Analysis (ESRS 2 IRO-1)

74Software conducts a Double Materiality Analysis (DMA) in accordance with the CSRD and ESRS 1 & 2 to identify sustainability IROs across the organisation and its value chain. The process is led by the CSR team and validated by the Executive Committee, with periodic updates to the Board of Directors and Audit Committee.

The DMA follows a structured six-step methodology that combines document review, expert interviews, workshops, and surveys with internal specialists and selected value-chain participants. This process maps interconnections (impacts, dependencies, risks, opportunities) and determines material topics against standardised criteria, ensuring consistency and comparability with ESRS requirements.

The analysis unfolds in two stages. First, mapping and screening identify potential IROs, establish their operational and financial relevance, and capture dependencies and value-chain touchpoints. Second, scoring and prioritisation assess each item using calibrated criteria for impacts (severity/magnitude, probability/likelihood, scope/scale, irremediability, and time horizon) and for risks and opportunities (financial performance, reputation, legal/regulatory, and business continuity), in line with ESRS 1 Section 2.5 on financial materiality. Results are consolidated into the materiality matrix with traceable justifications drawn from the evidence base.

Stakeholder engagement is embedded throughout. Subject-matter experts and employees contribute evidence via interviews and surveys; inputs are consolidated at defined milestones and feed both the materiality matrix and the IRO register.

Findings are reviewed by the CSR team, presented to the Executive Committee for validation, and reported to the Board and Audit Committee, embedding sustainability considerations within the broader risk-management framework and aligning with ESRS 2 GOV-1/GOV-2 governance disclosures (see Section 2.1.3.1).

Consistently with this framework, sustainability-related risks are integrated into the company's enterprise-wide risk-management system. 74Software manages these risks through its double materiality assessment, while the internal control function leads the overall corporate risk assessment. The two methodologies are closely aligned, ensuring that sustainability is treated as a strategic priority. As a result, sustainability risks are evaluated and prioritised using the same criteria as all other corporate risks, and material sustainability risks naturally emerge within the global risk assessment, which ranks risks based on their significance rather than their category.

The IRO register and the materiality matrix are updated annually to reflect evolving risks and opportunities, while the underlying methodology remains stable to preserve year-on-year comparability.

These updates inform strategic planning and risk oversight and support transparent, reliable reporting.

In 2025, the DMA process was refined to improve clarity and alignment with ESRS guidance. Key enhancements included more granular articulation of sustainability matters (e.g., splitting "Financial and digital inclusion" into separate topics), recalibration of legal and financial thresholds to reflect the Group's current scale, and strengthened scoring for regulatory risks such as digital accessibility. These refinements did not alter the core methodology but ensured greater precision, comparability, and decision-usefulness of materiality outcomes.

2.1.4.2 Material Impacts, Risks, and Opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

Through its materiality assessment, 74Software has identified 41 key impacts, risks, and opportunities (IROs), categorised under environmental, social & societal, and governance aspects. These IROs are detailed in the subsequent sections of this report, specifically in ESRS E1, E5, S1, S4, and G1.

The annual update of material IROs reflects several significant changes. The impact materiality of business conduct has been increased, with particular emphasis on corruption, corporate culture, and whistleblower protection, the latter now recognised as a material subtopic due to its critical role in governance and risk prevention. The financial materiality of employee data privacy has also been raised, reflecting higher potential fines and regulatory consequences under updated legal frameworks. In addition, risks related to digital accessibility have been reassessed as more significant, in response to a tightening regulatory landscape at both EU and national levels. The reassessment of working conditions showed that certain potential negative impacts had previously been overestimated. The updated analysis indicates that these impacts do not constitute a structural or systemic risk at Group level. As a result, the overall severity assessment of the impact has been reduced, and the scope of the population concerned is now considered more limited.

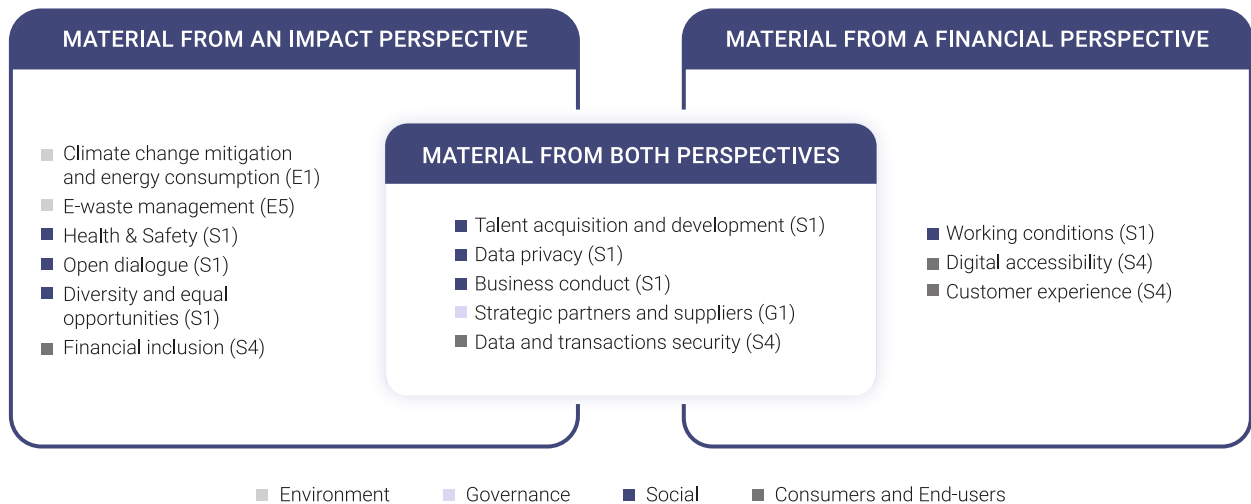
Together, these updates ensure that the Group's materiality assessment remains aligned with evolving regulatory requirements and best practices in sustainability governance.

Material impacts, risks, and opportunities per ESRS standards:

Standard	Topic	Material IROs
ESRS E1	Climate change mitigation and energy	I-
ESRS E5	E-waste management	I-
ESRS S1	Working conditions	R, O
	Health & safety	I-
	Talent acquisition and development	I-, I+, R, O
	Open dialogue	I-
	Diversity and equal opportunities	I+
	Data privacy	I-, R
ESRS S4	Financial inclusion	I+
	Digital accessibility	R
	Data and transaction security	I-, R
	Customer experience	R, O
ESRS G1	Business conduct	I-, I+, R, O
	Strategic partners and suppliers	R, I+

I-: negative impact(s); I+: positive impact(s); R: risk(s); O: opportunity(ies).

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The Sustainability Report outlines how 74Software identifies and assesses environmental and social risks within its supply chain. It details the evaluation procedures, including supplier assessments, to ensure compliance with sustainability standards. The report also maps out the actions taken to mitigate identified risks, such as the implementation of corrective action plans. Additionally, it explains how the Company monitors and reports on its due diligence activities, highlighting key performance indicators (KPIs) and providing regular updates to stakeholders.

The Double Materiality Assessment (DMA) process identifies and assesses material Impacts, Risks, and Opportunities (IROs), which are further detailed under each relevant topic in the sustainability statements. These material IROs are closely linked to 74Software's core business activities, primarily concentrated within its own operations. They relate to the Company's ability to develop and deliver software solutions, products, and projects, influencing and being influenced by key stakeholders such as clients, end-users, employees, data centre operations, and hardware management. Given their integration with the business model, most IROs are managed through ongoing operational processes, enabling direct intervention when necessary.

For environmental IROs within the upstream and downstream value chain, 74Software exerts direct influence by setting science-based targets to reduce greenhouse gas (GHG) emissions, implementing a low-carbon trajectory at the Group level, and strengthening procurement and waste management policies. However, the Company recognises that negative environmental impacts extend beyond its operational footprint, as climate change and electronic waste present global challenges.

The material environmental impacts identified are both actual and negative, primarily arising from the operational strain on the environment, particularly in relation to carbon emissions, energy consumption, and electronic waste generation. The social impacts identified are predominantly potential and negative, reflecting inherent challenges in the software sector, such as privacy concerns, high workload, and gaps in diversity and inclusion. However, mitigation measures, including policies and initiatives, are either already in place or scheduled for implementation in the coming years. Without such actions, these negative impacts could affect both employees and end-users.

Beyond risk mitigation, 74Software also generates positive impacts. The Company creates value for employees through training and skills development while supporting digitalisation for citizens, businesses, and public institutions. The anticipated timeframes for these impacts are classified into short-term, medium-term, and long-term categories.

Efforts to enhance opportunities and mitigate risks are embedded within the Company's governance structures, ensuring an integrated and proactive approach. As a result, 74Software demonstrates high resilience across the time horizons defined in the 2024 Due Diligence and Materiality Assessment. This resilience analysis relies on qualitative insights from internal subject-matter experts, providing a comprehensive evaluation of mitigating factors across all IROs.

At present, 74Software is unable to quantify the financial effects of its material risks and opportunities. However, ongoing assessments and enhancements to the DMA process will continue to refine the Company's understanding of these financial implications over time.

2.1.5 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement (ESRS 2 IRO-2)

74Software has structured its sustainability report to comply with the relevant ESRS Disclosure Requirements, as outlined by the Corporate Sustainability Reporting Directive (CSRD). Below is a list of the Disclosure Requirements that have been addressed in this report, alongside references to the relevant sections.

The material information to be disclosed was determined based on the impacts, risks and opportunities identified as material through the double materiality assessment, using the methodology described in the previous section. Following this assessment, 74Software conducted a mapping exercise to align the material IROs with the applicable Disclosure Requirements, as presented in the table below, ensuring that all relevant ESRS topics and information are appropriately covered.

ESRS Standard	Disclosure requirement	Paragraph DR's	Materiality Status
ESRS E1 – Climate Change	Disclosure Requirement E1-2 – Policies related to climate change mitigation and adaptation	2.2.3 Disclosure Requirement E1-2 Policies related to climate change mitigation and adaptation	Material
	Disclosure Requirement E1-3 – Actions and resources in relation to climate change policies	2.2.4 Disclosure Requirement E1-3 Actions and resources in relation to climate change policies	Material
	Disclosure Requirement E1-4 – Targets related to climate change mitigation and adaptation	2.2.5 Disclosure Requirement E1-4 Target related to climate change mitigation and adaptation	Material
	Disclosure Requirement E1-5 – Energy consumption and mix	2.2.6 Disclosure Requirement E1-5 Energy consumption and mix	Material
	Disclosure Requirement E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions	2.2.7 Disclosure Requirement E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	Material
	Disclosure Requirement E1-7 – GHG removals and GHG mitigation projects financed through carbon credits	2.2.8 Disclosure Requirement E1-7 – GHG removals and GHG mitigation projects financed through carbon credits	Not material
	Disclosure Requirement E1-8 – Internal carbon pricing	2.2.9 Disclosure Requirement E1-8 – Internal carbon pricing	Not material
	Disclosure Requirement E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities		Not material
ESRS E5 – Resource use and circular economy	Disclosure Requirement E5-1 – Policies related to resource use and circular economy	2.3.2 Disclosure Requirement E5-1 – Policies related to resource use and circular economy	Material
	Disclosure Requirement E5-2 – Actions and resources related to resource use and circular economy	2.3.3 Disclosure Requirement E5-2 – Actions and resources related to resource use and circular economy	Material
	Disclosure Requirement E5-3 – Targets related to resource use and circular economy	2.3.4 Disclosure Requirement E5-3 – Targets related to resource use and circular economy	Not published this year
	Disclosure Requirement E5-4 – Resource inflows	2.3.5 Disclosure Requirement E5-4 and E5-5 – Resource inflows and outflows	Not material
	Disclosure Requirement E5-5 – Resource outflows	2.3.5 Disclosure Requirement E5-4 and E5-5 – Resource inflows and outflows	Not material
	Disclosure Requirement E5-6 – Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	2.3.6 Disclosure Requirement E5-6 Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	Not published this year

ESRS Standard	Disclosure requirement	Paragraph DR's	Materiality Status
ESRS S1 – Own Workforce	Disclosure Requirement S1-1 – Policies related to own workforce	2.5.2 Disclosure Requirement S1-1 – Policies related to own workforce	Material
	Disclosure Requirement S1-2 – Processes for engaging with own workforce and workers' representatives about impacts	2.5.3 Disclosure Requirement S1-2 – Processes for engaging with own workforce and workers' representatives about impacts	Material
	Disclosure Requirement S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	2.5.4 Disclosure Requirement S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns	Material
	Disclosure Requirement S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	2.5.5 Disclosure Requirement S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Material
	Disclosure Requirement S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	2.5.6 Disclosure Requirement S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Material
	Disclosure Requirement S1-6 – Characteristics of the undertaking's employees	2.5.7 Disclosure Requirement S1-6 – Characteristics of the undertaking's employees	Material
	Disclosure Requirement S1-7 – Characteristics of non-employees in the undertaking's own workforce	2.5.8 Disclosure Requirement S1-7 – Characteristics of non-employees in the undertaking's own workforce	Material
	Disclosure Requirement S1-8 – Collective bargaining coverage and social dialogue	2.5.9 Disclosure Requirement S1-8 – Collective bargaining coverage and social dialogue	Material
	Disclosure Requirement S1-9 – Diversity metrics	2.5.10 Disclosure Requirement S1-9 – Diversity metrics	Material
	Disclosure Requirement S1-10 – Adequate wages	2.5.11 Disclosure Requirement S1-10 – Adequate wages	Material
	Disclosure Requirement S1-11 – Social protection	2.5.12 Disclosure Requirement S1-11 – Social protection	Material
	Disclosure Requirement S1-12 – Persons with disabilities		Not material
	Disclosure Requirement S1-13 – Training and skills development metrics	2.5.13 Disclosure Requirement S1-13 – Training and skills development metrics	Material
	Disclosure Requirement S1-14 – Health and safety metrics	2.5.14 Disclosure Requirement S1-14 – Health and safety metrics	Material
	Disclosure Requirement S1-15 – Work-life balance metrics	2.5.15 Disclosure Requirement S1-15 – Work-life balance metrics	Material
	Disclosure Requirement S1-16 – Remuneration metrics (pay gap and total remuneration)	2.5.16 Disclosure Requirement S1-16 – Remuneration metrics (pay gap and total remuneration)	Material
	Disclosure Requirement S1-17 – Incidents, complaints and severe human rights impacts	2.5.17 Disclosure Requirement S1-17 – Incidents, complaints and severe human rights impacts	Material
ESRS S4 – consumers and end-users	Disclosure Requirement S4-1 – Policies related to consumers and end-users	2.6.2 Disclosure Requirement S4-1 – Policies related to consumers and end-users	Material
	Disclosure Requirement S4-2 – Processes for engaging with consumers and end-users about impacts	2.6.3.1 Disclosure Requirement S4-2 – Processes for engaging with consumers and end-users about impacts 2.6.4.1 Disclosure Requirement S4-2 – Processes for engaging with consumers and end-users about impacts 2.6.5.1 Disclosure Requirement S4-2 – Processes for engaging with consumers and end-users about impacts 2.6.6.1 Disclosure Requirement S4-2 – Processes for engaging with consumers and end-users about impacts	Material

ESRS Standard	Disclosure requirement	Paragraph DR's	Materiality Status
ESRS S4 – consumers and end-users	Disclosure Requirement S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	2.6.3.2 Disclosure Requirement S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns 2.6.4.2 Disclosure Requirement S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns 2.6.5.2 Disclosure Requirement S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns 2.6.6.2 Disclosure Requirement S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Material
	Disclosure Requirement S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	2.6.3.3 Disclosure Requirement S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions 2.6.4.3 Disclosure Requirement S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions 2.6.5.3 Disclosure Requirement S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions 2.6.6.3 Disclosure Requirement S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	Material
	Disclosure Requirement S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	2.6.3.4 Disclosure Requirement S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities 2.6.4.4 Disclosure Requirement S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities 2.6.5.4 Disclosure Requirement S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities 2.6.6.4 Disclosure Requirement S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Material
ESRS G1 – Business conduct	Disclosure Requirement G1-1 – Business conduct policies and corporate culture	2.7.2 Disclosure Requirement G1-1 – Business conduct policies and corporate culture	Material
	Disclosure Requirement G1-2 – Management of relationships with suppliers	2.7.3 Disclosure Requirement G1-2 – Management of relationships with suppliers	Material
	Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery	2.7.4 Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery	Material
	Disclosure Requirement G1-4 – Incidents of corruption or bribery	2.7.5 Disclosure Requirement G1-4 – Incidents of corruption or bribery	Material
	Disclosure Requirement G1-5 – Political influence and lobbying activities	2.7.6 Disclosure Requirement G1-5 – Political influence and lobbying activities	Not material
	Disclosure Requirement G1-6 – Payment practices	2.7.7 Disclosure Requirement G1-6 – Payment practices	Material

Compliance with EU Legislative Data points

In addition to complying with the European Sustainability Reporting Standards (ESRS), 74Software has incorporated specific data points required by EU legislation, as outlined in Appendix B of the ESRS framework. These include mandatory disclosures under the Non-Financial Reporting Directive (NFRD), the EU Taxonomy, and other relevant regulations.

List of data points in cross-cutting and topical standards that derive from other EU legislation

Disclosure Requirement and related datapoint	SFDR (23) refer	Pillar 3 (24) refer	Benchmark Regulation (25) refer	EU Climate Law (26) refer	Materiality Status	Section
ESRS 2 GOV-1 Board's gender diversity, paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (27), Annex II		Material	Section 2.1.3.1
ESRS 2 GOV-1 Percentage of board members who are independent, paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		Material	Section 2.1.3.1
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	Indicator number 10 Table #3 of Annex 1				Material	Section 2.1.3.4
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (28) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social	Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 (29), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco, paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS E1-1 Transition plan to reach climate neutrality by 2050, paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	Material	Section 2.2.2

Disclosure Requirement and related datapoint	SFDR (23) refer	Pillar 3 (24) refer	Benchmark Regulation (25) refer	EU Climate Law (26) refer	Materiality Status	Section
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks, paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		Not material	
ESRS E1-4 GHG emission reduction targets, paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		Material	Section 2.2.5
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), paragraph 38	Indicator number 5 Table #1 and Indicator number 5 Table #2 of Annex 1				Not material	
ESRS E1-5 Energy consumption and mix, paragraph 37	Indicator number 5 Table #1 of Annex 1				Material	Section 2.2.6
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				Not material	
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		Material	Section 2.2.7
ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		Material	Section 2.2.7

Disclosure Requirement and related datapoint	SFDR (23) refer	Pillar 3 (24) refer	Benchmark Regulation (25) refer	EU Climate Law (26) refer	Materiality Status	Section
ESRS E1-7 GHG removals and carbon credits, paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Not material	
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk, paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book – Climate change physical risk: Exposures subject to physical risk			Not material	
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book – Climate change transition risk: Loans collateralised by immovable property – Energy efficiency of the collateral			Not material	
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Not material	
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				Not material	
ESRS E3-1 Water and marine resources, paragraph 9	Indicator number 7 Table #2 of Annex 1				Not material	
ESRS E3-1 Dedicated policy, paragraph 13	Indicator number 8 Table 2 of Annex 1				Not material	
ESRS E3-1 Sustainable oceans and seas, paragraph 14	Indicator number 12 Table #2 of Annex 1				Not material	
ESRS E3-4 Total water recycled and reused, paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Not material	

Disclosure Requirement and related datapoint	SFDR (23) refer	Pillar 3 (24) refer	Benchmark Regulation (25) refer	EU Climate Law (26) refer	Materiality Status	Section
ESRS E3-4 Total water consumption in m ³ per net revenue on own operations, paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Not material	
ESRS 2- SBM 3 - E4, paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				Not material	
ESRS 2- SBM 3 - E4, paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				Not material	
ESRS 2- SBM 3 - E4, paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				Not material	
ESRS E4-2 Sustainable land/agriculture practices or policies, paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				Not material	
ESRS E4-2 Sustainable oceans/seas practices or policies, paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				Not material	
ESRS E4-2 Policies to address deforestation, paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				Not material	
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				Material for e-waste	
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	Indicator number 9 Table #1 of Annex 1				Not material	
ESRS 2- SBM3 - S1 Risk of incidents of forced labour, paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				Not material	
ESRS 2- SBM3 - S1 Risk of incidents of child labour, paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				Not material	
ESRS S1-1 Human rights policy commitments, paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				Material	Section 2.5.2.5
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		Material	Section 2.5.2.5
ESRS S1-1 Processes and measures for preventing trafficking in human beings, paragraph 22	Indicator number 11 Table #3 of Annex I				Not material	
ESRS S1-1 Workplace accident prevention policy or management system, paragraph 23	Indicator number 1 Table #3 of Annex I				Material	Section 2.5.2.6

Disclosure Requirement and related datapoint	SFDR (23) refer	Pillar 3 (24) refer	Benchmark Regulation (25) refer	EU Climate Law (26) refer	Materiality Status	Section
ESRS S1-3 Grievance/complaints handling mechanisms, paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				Material	Section 2.5.4.1
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Material	
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				Material	
ESRS S1-16 Unadjusted gender pay gap, paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Material	Section 2.5.16.1
ESRS S1-16 Excessive CEO pay ratio, paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				Material	Section 2.5.16.2
ESRS S1-17 Incidents of discrimination, paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				Material	Section 2.5.17
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines, paragraph 104 (a)	Indicator number 10 Table #1 and Indicator number 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12(1)		Not material	
ESRS 2- SBM3 - S2 Significant risk of child labour or forced labour in the value chain, paragraph 11 (b)	Indicators number 12 and number 13 Table #3 of Annex I				Not material	
ESRS S2-1 Human rights policy commitments, paragraph 17	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Not material	
ESRS S2-1 Policies related to value chain workers, paragraph 18	Indicator number 11 and number 4 Table #3 of Annex 1				Not material	
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines, paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12(1)		Not material	
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Not material	

Disclosure Requirement and related datapoint	SFDR (23) refer	Pillar 3 (24) refer	Benchmark Regulation (25) refer	EU Climate Law (26) refer	Materiality Status	Section
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material	
ESRS S3-1 Human rights policy commitments, paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Not material	
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines, paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12(1)		Not material	
ESRS S3-4 Human rights issues and incidents, paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material	
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Not material	
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines, paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12(1)		Not material	
ESRS S4-4 Human rights issues and incidents, paragraph 35	Indicator number 14 Table #3 of Annex 1				Not material	
ESRS G1-1 United Nations Convention against Corruption, paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				Material	Section 2.7.2
ESRS G1-1 Protection of whistle-blowers, paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				Not material	
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws, paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		Material	Section 2.7.5
ESRS G1-4 Standards of anti-corruption and anti-bribery, paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				Material	Section 2.7.4

2.2 Climate Change (ESRS E1)

As a leading software company, 74Software recognises both its responsibility and its role in addressing climate change. While digital activities rely on energy-intensive infrastructure, software solutions can also act as key enablers of emissions reductions. Accordingly, 74Software is committed to minimising the environmental impact of its own operations, digital infrastructure and products, while leveraging its technological expertise to support lower-carbon solutions for its clients and contribute to the transition to a sustainable economy.

Environmental responsibility is embedded at the highest levels of governance and integrated into 74Software’s long-term strategy and decision-making processes. This commitment is reflected in executive accountability: 5% of the variable remuneration of the Chief Executive Officer and Deputy Chief Executive Officer is linked to the reduction of 74Software’s carbon footprint. Achievement of these environmental criteria is assessed annually by the Board of Directors, based on the recommendation of the Remuneration Committee, at the time of approval of the financial statements.

This section presents 74Software’s approach to managing its most material climate-related impacts, with a particular focus on climate change mitigation and energy management, in line with ESRS E1. This approach extends beyond the Company’s own

operations and includes expectations for partners and suppliers, thereby supporting emissions reductions across the value chain.

74Software also supports its clients in their sustainability journeys through the implementation of a digital sustainability strategy aimed at reducing the environmental footprint of digital technologies while enabling more sustainable business processes.

These commitments are formalised in the Environmental & Digital Sustainability Policy, which defines 74Software’s principles, governance framework and high-level environmental commitments. The Policy applies to all 74Software entities and employees and, where relevant, to suppliers and partners. It is publicly available at: <https://www.74software.com/about-us/corporate-social-responsibility>.

In this context, 74Software commits to:

- supporting the objective of limiting global warming to 1.5°C, in line with the Paris Agreement, and contributing to climate neutrality in Europe by 2050;
- reducing its greenhouse gas emissions through a continuous improvement approach;
- integrating sustainability considerations into governance, strategy, product design and stakeholder relationships.

2.2.1 Climate change IROs (E1)

The Impact, Risk, and Opportunities (IRO) analysis was conducted with a comprehensive scope, considering 74Software’s business activities and geographical footprint. The analytical process involved engagement with key stakeholders through interviews and surveys, as well as collaboration with an external consulting firm to define and validate 74Software’s double materiality assessment. As part of this process, a high-level evaluation of

physical and transition risks and opportunities was carried out. This assessment concluded that adaptation to climate change is not considered a material matter, as detailed in Section ESRS 2: 2.1.4 “Impacts, Risks, and Opportunities management (IRO)”. A more detailed analysis, including scenario-based evaluations and transition event assessments, is planned to further examine exposure and impacts along the value chain.

IROs	Value Chain Location			Time Horizon		
	Upstream	Own operations	Downstream	Short term	Medium term	Long Term
<p>Climate change mitigation</p> <p>GHG emissions linked to 74Software’s activities contribute to climate change by increasing greenhouse gases in the atmosphere, driving global temperature rise and related impacts. A significant share of these emissions stems from the digital infrastructure essential to its operations (data centres, cloud services and electronic devices), within an industry estimated to account for around 4% of global GHG emissions.</p>	Impact -	✓	✓	✓	✓	✓
<p>Energy</p> <p>74Software’s operations as a software publisher require continuous energy use, contributing to climate change. The growing energy demand of the software also creates systemic risks by straining electricity grids and increasing costs. Additional indirect impacts arise from hardware manufacturing, cooling systems and data storage.</p>	Impact -		✓	✓	✓	✓

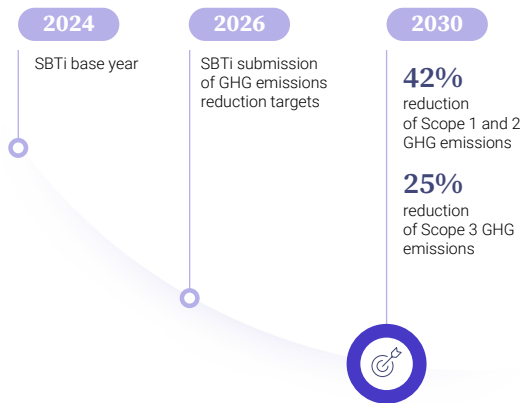
2.2.2 Transition plan for climate change mitigation (E1-1)

While 74Software does not yet have a formal climate change mitigation transition plan ensuring full compatibility with the transition to a sustainable economy and the limitation of global warming to 1.5°C in line with the Paris Agreement, nor with the objective of achieving climate neutrality by 2050 as set out in Regulation (EU) 2021/1119 (European Climate Law), 74Software has already taken significant structuring steps and is actively progressing towards this objective.

74Software has submitted its company-wide near-term greenhouse gas reduction targets to the Science-Based Targets initiative (SBTi). These targets include:

- a reduction of Scope 1 and Scope 2 (market-based) GHG emissions by 42% by 2030 from a 2024 base year; and
- a reduction of Scope 3 GHG emissions by 25% by 2030 from the same base.

Science-Based Targets Submitted



The Company will publicly disclose its company-wide GHG inventory and progress against its SBTi-approved targets on an annual basis through its sustainability reporting, which will be subject to third-party audit. In addition, the Company will disclose this information annually through the CDP questionnaire.

The Company's decarbonisation trajectory and near-term targets are assessed against a forward-looking business-as-usual scenario reflecting expected growth by 2030, including a significant increase in cloud and SaaS consumption in broadly stable. Headcount assumptions reflect differentiated regional dynamics, and emissions projections incorporate expected reductions in relevant emission factors over time, in line with CDP and SBTi methodological guidance and sectoral decarbonisation trends. Against this growth-oriented baseline, the Company's pathway relies on absolute Scope 1 and Scope 2 emissions reductions and mitigation measures to limit and reduce Scope 3 emissions growth, demonstrating progressive decoupling between business growth and greenhouse gas emissions.

Emissions related to the use of sold products are inherently subject to material methodological uncertainty, as they depend on assumptions and external factors beyond the Company's control, including customer infrastructure, energy mix and usage patterns. Accordingly, the resulting estimates are considered indicative and intended to provide an order of magnitude. For this reason, emissions related to the use of sold products are not included in the Company's near term greenhouse gas reduction targets submitted to the SBTi.

74Software's decarbonisation trajectory is structured around a set of key operational drivers designed to support the achievement of its Scope 1, Scope 2 and Scope 3 emission reduction targets.

For Scope 1 and Scope 2, the main measures planned include:

- responsible mobility, including the progressive conversion of the corporate vehicle fleet to hybrid and electric vehicles where compatible with operational needs;
- energy efficiency, through the optimisation of office space, reduction of energy consumption, and improvement of building performance;
- renewable energy, by increasing the procurement of lower-carbon and renewable electricity sources, in addition to energy-efficiency efforts.

For Scope 3, the main measures planned include:

- procurement, identified as a major lever for decarbonisation, with a focus on responsible purchasing practices and the prioritisation of lower-carbon products and services;
- eco-design of products, including efforts to reduce emissions during the use phase and across the product lifecycle;
- promotion of low-emission business travel options particularly where feasible while maintaining necessary client engagement and service quality; and
- circular economy initiatives, aimed at reducing electronic waste generation by limiting raw material consumption, increasing reuse, repair and recycling, and ensuring responsible end-of-life management of equipment.

For the current reporting period, while these key decarbonisation levers and planned actions have been identified, the Company has not yet quantitatively assessed their individual or combined greenhouse gas abatement potential. The quantification of the expected emissions reduction impacts of these actions will be performed as part of the development and formalisation of the Company's climate change mitigation transition plan.

For the current reporting period, the Company has not conducted a dedicated analysis of carbon lock-in risks associated with existing assets or contractual arrangements.

74Software's objective is to have a climate change mitigation transition plan formally approved by its administrative, management and supervisory bodies for the 2027 financial year. This plan will be fully embedded in and aligned with the Group's overall business strategy and financial planning.

2.2.3 Policies related to climate change mitigation (E1-2)

74Software is committed to addressing the challenges posed by climate change while actively managing environmental risks and opportunities. The Impact, Risk and Opportunities analysis was conducted on the complete business and geographical scope of 74Software.

The following table address each impact, risk, and opportunity separately under its respective topic.

IROs

Climate change mitigation

GHG emissions linked to 74Software's activities contribute to climate change by increasing greenhouse gases in the atmosphere, driving global temperature rise and related impacts. A significant share of these emissions stems from the digital infrastructure essential to its operations (data centres, cloud services and electronic devices), within an industry estimated to account for around 4% of global GHG emissions.

Impact -

Policy

74Software's climate change mitigation commitments and actions are embedded in the Environmental and Digital Sustainability policy, as well as in the Group level Supplier and Partner Charter, and Code of Ethics. In 2025 the company signed the Global compact commitment on a 74Software Group level, continuing to demonstrate its dedication to sustainable and responsible business practices, working on transition to a low-carbon economy, reducing greenhouse gas emissions, and promoting sustainable environmental practices.

Through the Environmental and Digital Sustainability policy the company commits to supporting the global objective of limiting global warming to 1.5°C, in line with the Paris Agreement, and contributing to achieving climate neutrality in Europe by 2050. Key commitments in this policy are:

- reducing its greenhouse gas (GHG) emissions through a continuous improvement approach, prioritising emissions avoidance and reduction;
- integrating sustainability considerations into decision-making, product design, and relationships with stakeholders;
- incorporating digital sustainability principles and eco-design into its products and services development.

74Software's Supplier and Partner Charter incorporates its commitments to suppliers. These include reducing the environmental impact of their activities, sites, products and/or services, measuring and reducing greenhouse gas emissions, and preserving natural resources by controlling energy consumption.

The Code of Ethics focuses on the Group's efforts to reduce its carbon footprint support the transition to a low-carbon economy, including limiting its reliance on fossil fuels, and measuring and managing its impacts across own operations and value chain; as well as implementing the digital sustainability strategy by incorporating principles of eco-design, resource efficiency, and responsible procurement to reduce the environmental footprint of our solutions.

Programmes

74Software implements several programmes of coordinated actions, measures and resources to address climate change mitigation. As part of its Climate governance programme the Group performs an annual carbon inventory, covering Scopes 1, 2, and 3, serving as the base for monitoring and measurement of its climate change mitigation actions results. For its Scopes 1 and 2 emissions reductions programme, the Group conducts continuous improvements of the facilities' energy consumption, performs renewable electricity sourcing (market-based decarbonisation), and implements gradual electrification of the company vehicles. Within the Scope 3 emissions reductions programme the Company optimises its business travels, works on its procurement criteria, improves the waste and e-waste management. The SBTi submission encompasses 74Software's ambition to support the limiting of the global warming to 1.5°C, and contribute to achieving Europe's carbon neutrality by 2050.

Energy

74Software's operations as a software publisher require continuous energy use, contributing to climate change. The growing energy demand of the software also creates systemic risks by straining electricity grids and increasing costs. Additional indirect impacts arise from hardware manufacturing, cooling systems and data storage.

Impact -

Policy

74Software's Environmental and Digital Sustainability Policy, together with the Supplier and Partner Charter, the Code of Ethics, and its commitment to the United Nations Global Compact, establish the framework governing the management of energy consumption and related climate impacts. These policies define principles for responsible energy use, continuous improvement of energy efficiency, and the progressive transition towards lower-carbon and renewable energy sources. They apply both to the Company's direct operations and, where relevant, to its supply chain via responsible procurement expectations. Through these commitments, 74Software seeks to mitigate its environmental impact associated with energy consumption, and enhance operational resilience through improved energy performance.

Programmes

As part of its Scope 1 and Scope 2 emissions reduction programme, 74Software implements measures aimed at optimising energy consumption across its office portfolio. The Company applies agile working arrangements, enabling employees to work up to 60% remotely and 40% on-site. This approach contributes to a reduction in energy demand within office premises and, additionally, supports a decrease in commuting-related emissions. 74Software also optimises its real estate footprint by consolidating, uniting or closing selected sites and relocating certain offices to modern, energy-efficient or environmentally certified co-working spaces. These actions enable the Company to benefit from improved building performance standards and more efficient energy systems. Furthermore, the reduction of unused or underutilised office areas contributes to lower overall energy consumption and improved space efficiency.

2.2.4 Actions and resources in relation to climate change policies (E1-3)

In 2025, 74Software continued to advance a series of initiatives designed to reduce greenhouse gas emissions and lower energy consumption across the Group's operations. The agile working model, originally introduced years earlier within the Axway division, remained a lever for emission reduction. By enabling employees to work 60% remotely and 40% on-site, the Group continued to limit emissions from daily commuting while also reducing the energy required to operate office spaces. In parallel, 74Software intensified its efforts to optimise its real estate footprint. Through the consolidation of certain office locations, and the reduction of underutilised office space, several sites successfully downsized their office surfaces throughout 2025, contributing to additional energy efficiency gains. Furthermore, two of the offices locations operate on 100% renewable electricity, reinforcing 74Software's commitment to low carbon operations and aligning with its long-term climate ambitions.

As a direct result of these workspace optimisations and the transition to flexible office arrangements, Scopes 1 and 2 CO₂ emissions from Axway's offices in Belgium, Bulgaria, France, Germany, India and USA decreased with 425.6 tCO₂eq, representing a 44.5% reduction in these locations. In 2025 SBS optimised office space in Belgium, France and Lebanon, decreasing its Scope 1 and 2 emissions with 391.0 tCO₂eq – 39.8% reduction in these locations.

In addition to optimising office energy use, 74Software has continued the transition of its vehicle fleet to hybrid and electric models. This shift forms part of the Group's broader efforts to reduce greenhouse gas emissions and advance sustainable mobility solutions. By adopting cleaner transportation options, the Company reinforces its commitment to environmental responsibility and contributes to reducing its operational carbon footprint.

Another key pillar of 74Software's sustainability strategy is its engagement with suppliers through the Supplier and Partner Charter. This charter encourages suppliers and partners to measure and reduce their environmental impact, fostering the adoption of sustainable practices across the supply chain.

74Software remains firmly committed to decarbonisation. However, for the current reporting period, 74Software is not in a position to disclose the financial impacts associated with its emissions reduction actions. The relevant financial data is not yet available, in line with applicable phase-in provisions. In the future disclosures, as part of the ongoing efforts to enhance transparency, the Company is committed to allocate resources and develop a structured financial reporting related to climate change mitigation actions.

In 2025, 74Software did not finance any greenhouse gas (GHG) removal or mitigation projects through carbon credits.

2.2.4.1 Focus on Digital sustainability strategy deployment

74Software's digital sustainability strategy addresses climate change mitigation by reducing the environmental impacts of its digital services and software products throughout their life cycle. This approach contributes in particular to the management of Scope 3 greenhouse gas emissions and complements the Group's broader climate strategy.

As part of this approach, 74Software has enhanced the robustness and completeness of its GHG measurement framework through the deployment of carbon calculators covering emissions related to the use of sold products. This work aims to improve the consistency and transparency of Scope 3 emissions estimates and to inform product-level decarbonisation efforts.

The digital sustainability strategy is based on measurement, continuous improvement and the progressive integration of eco-design principles into product development and operations, while supporting clients and partners in their own sustainability efforts.

In alignment with its Environmental & Digital Sustainability policy, 74Software's Executive Committee translates the Group's sustainability strategy into operational priorities and oversees its implementation across functions. The CEO, supported by the Deputy CEO and the Head of CSR, monitors progress and escalates significant sustainability-related matters to the Board as appropriate.

Digital sustainability is sponsored by the Chief of Research & Development Officer, a member of the Executive Committee. It is led by the Digital Sustainability Manager within the CSR team and directly supervised by the Head of CSR. Deployment is supported by a network of digital sustainability representatives across all business units and an internal community of contributors.

Environmental considerations are progressively embedded into software development and operations, notably through:

- software architecture guidelines;
- non-functional product requirements;
- development, testing and operational processes.

74Software relies on recognised reference frameworks and methodologies, including the *Référentiel Général d'Écoconception des Services Numériques* (RGESN), ISO 14040/14044, the GHG Protocol ICT Sector Guidance, and BOAVIZTA methodologies.

During 2025, 74Software continued to deploy and consolidate its digital sustainability actions, with a focus on embedding eco-design as a continuous improvement process across the life cycle of its digital services and on strengthening the measurement of environmental impacts.

Key actions and progress in 2025 include:

- deployment of environmental impact measurement tools for digital services, including calculators covering emissions related to the use of 74Software’s sold strategic products, extended as of last year to SBS products in addition to Axway products, representing a key milestone in the measurement of Scope 3 emissions;
- integration of eco-design principles into software architecture guidelines and non-functional product requirements, supporting systematic consideration of environmental impacts at key stages of design, development, testing and operation;
- conduct of life-cycle assessments (LCAs) for selected flagship products hosted on AWS during performance testing phases, in line with ISO 14040/14044 standards, the GHG Protocol ICT Sector Guidance and BOAVIZTA methodologies;
- initial product-level decarbonisation efforts, including optimisations applied to shared software components;
- completion of seven RGENN-based eco-design audits in 2025, each resulting in identified reduction levers and associated action plans;
- roll-out of eco-design and impact-measurement training for relevant teams.

These actions reflect a structured approach combining training, application of eco-design best practices, life-cycle-based impact assessments, periodic audits, and the definition of improvement objectives and action plans. This approach is applied throughout the operational life of products and adapted to their maturity, usage and technical context.

At this stage, the Company is not yet able to disclose the financial impacts (CAPEX and OPEX) allocated to digital sustainability actions. Work is ongoing to progressively structure financial tracking for future disclosures.

In 2026, in alignment with the Company’s near-term, company-wide greenhouse gas reduction targets submitted to the SBTi, digital sustainability initiatives are expected to prioritise the consolidation and extension of existing actions, as detailed in the table below, including:

- scaling awareness-raising and training on eco-design and RGENN principles across R&D and related functions;
- further systematisation of life-cycle-based environmental assessments for strategic products;
- enhanced monitoring of environmental impacts of AWS-hosted services, including analysis of monthly trends to support operational optimisation;
- extension of eco-design audits to a broader perimeter of strategic products and formalisation of associated improvement plans;
- continued deployment of product-level decarbonisation measures, including optimisations applied to shared software components;
- reinforcement of supplier and partner engagement, including environmental impact questionnaires and awareness workshops, in recognition of their contribution to value-chain emissions.

These priorities may evolve following a potential update of the Company’s near-term SBTi targets and the subsequent adoption of the Group’s climate transition plan.

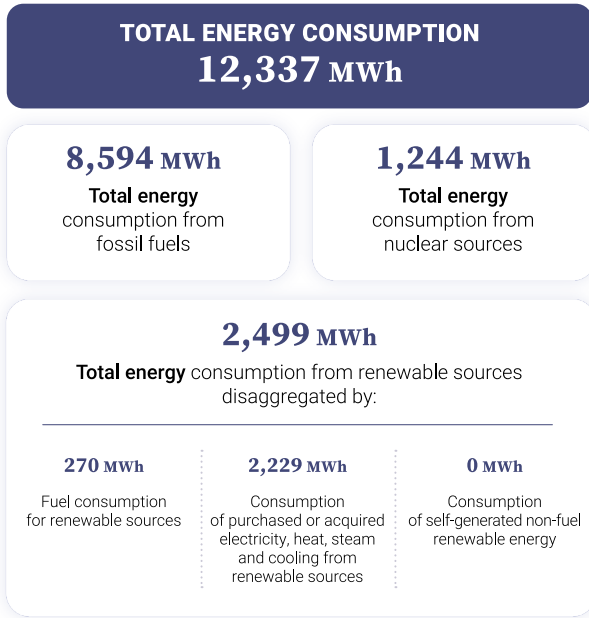
Disclosure of Key Action	Description	Scope of Action (2025)	Time Horizon	Progress Updates
Implement environmental impact measurement tool	Develop and deploy a tool to quantify the environmental footprint (e.g., carbon emissions, energy consumption) of our software products across their lifecycle. Focus on cloud services, and desktop applications.	74Software	24 months	Deployed across two SBS strategic products in 2025, covering five assessments, with quantifiable optimisation outcomes.
Conduct annual eco-design audits and environmental impact assessments	Perform yearly reviews of software development processes and product designs to identify and address environmental impact hotspots. This includes assessing code efficiency, resource utilisation, and end-of-life considerations.	74Software	Annually	Seven eco-design audits were conducted in 2025, covering two SBS products and five Axway products.
Train employees in eco-design and impact measurement	Develop and deliver training programmes to educate employees on eco-design principles and the use of impact measurement tools. This includes developers, designers, product managers, and other relevant staff.	74Software	Annually	In 2025, at the 74Software level, 316 employees took part in a 30 minute webinar, while 84 employees completed a full day eco-design training programme.
Establish a network of digital sustainability referents	Form a network of designated employees responsible for promoting and implementing digital sustainability practices within their respective product teams. This includes sharing best practices, providing guidance, and monitoring progress.	74Software	Ongoing coordination	One designated referent per SBS product line, and a transversal referent covering all Axway product lines.

2.2.5 Target related to climate change mitigation and adaption (E1-4)

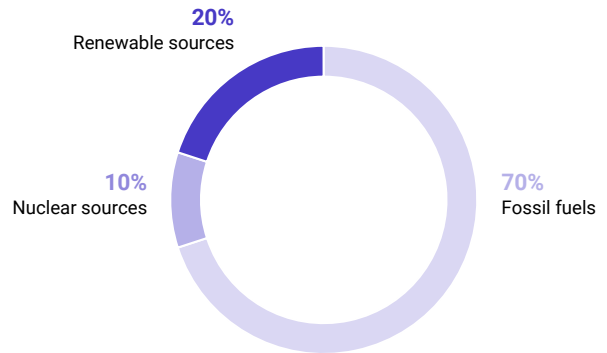
The greenhouse gas reduction targets submitted to SBTi, are published in Section 2.2.2.

2.2.6 Energy consumption and mix (E1-5)

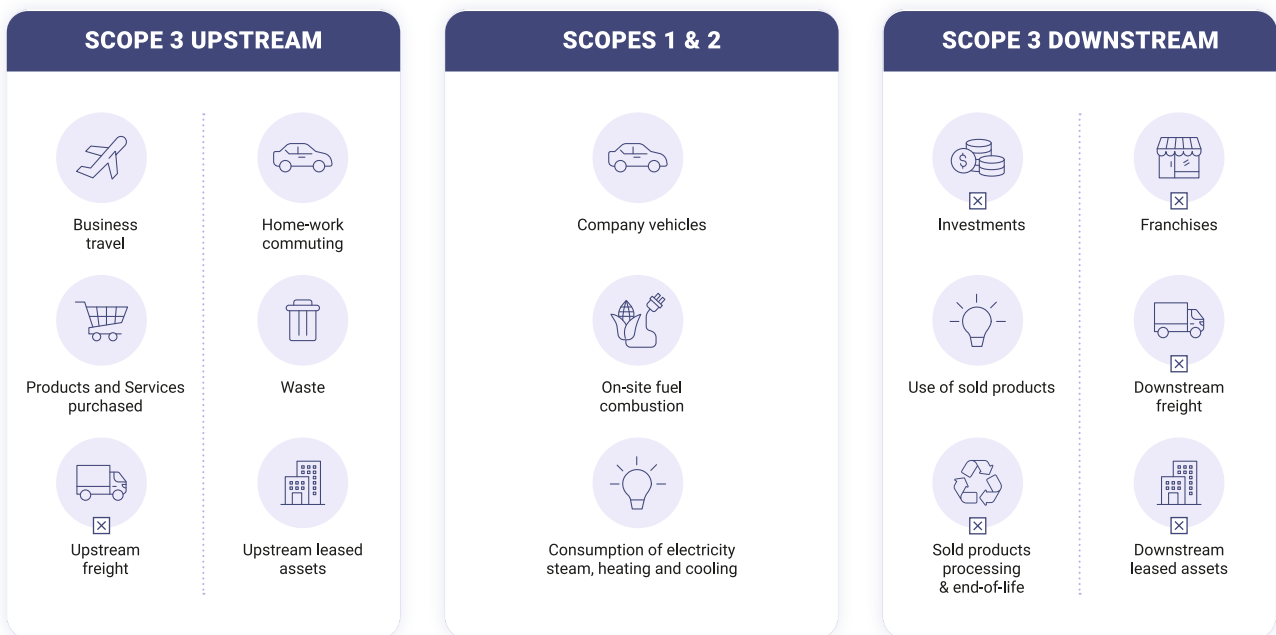
For all sites, with the exception of those covered by green certificates, 74Software applied the most recent country-specific electricity and energy mix data available on the website of the International Energy Agency (IEA). The mobile combustion energy from the company vehicles is calculated in low heating value.



Energy mix



2.2.7 Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6)



Sources of emissions for which 74Software is not eligible.

The greenhouse gas (GHG) emissions assessment follows the GHG Protocol framework, providing a comprehensive analysis of all three emission scopes. For this Universal Registration Document (URD) we used two different 12 month reporting periods. For the offices and data centres energy consumption, fugitive emissions, and waste we collected data from Q4 2024 to Q3 2025. For the rest of the data points, the reporting period was the standard calendar year from January to December 2025.

Methodology by scope⁽¹⁾:

Scope 1:

Stationary combustion: calculated based on site-level energy consumption by fuel type, using data collected directly from sites where available. Except for France, natural gas and fuel oil emissions are calculated using average European emission factors. Emission factors are sourced from the ADEME Base Empreinte® database, with LHV converted to HHV using energy-specific ratios.

Mobile combustion: determined by fuel and electricity volumes for vehicles, including hybrids, with data consolidated by 74Software and emission factors sourced from the ADEME Base Empreinte® database, applied according to fuel type or country's electricity mix. Where consumption data were unavailable but fleet size was known, extrapolations were applied. Hybrid vehicles are included under gasoline by default.

Fugitive emissions: calculated based on reported total or recharged refrigerant quantities per site, using emission factors from the ADEME Base Empreinte® database (R-134a, R-410a, R-22). Where data is missing, R-410a is assumed and quantities are extrapolated based on surface area; if leakage volumes are unknown, a 2.5% leak rate is applied in line with United States Environmental Protection Agency guidance.

Scope 2:

Electricity consumption: calculated based on electricity bills, with renewable shares verified through certificates. Where data is unavailable, consumption is extrapolated based on surface area. Emission factors are sourced from the ADEME Base Empreinte® database, reflecting the local electricity mix. Emissions from heating, cooling and steam are calculated using kWh consumption data.

Scope 3:

Fuel- and energy-related emissions (not included in Scopes 1 and 2) were calculated using energy consumption data and the ADEME methodology. Purchased goods and services were primarily estimated using spend-based approaches, with specific supplier data applied where available (e.g. Dell), and exclusions disclosed separately.

Waste emissions were calculated using site-reported data; where unavailable, extrapolations were made based on a representative reference site and headcount distribution, applying ADEME emission factors and average end-of-life treatment assumptions.

Business travel emissions were primarily calculated using provider-reported CO₂ or distance data, with extrapolations applied where necessary. Employee commuting was estimated using survey data adjusted for current headcount.

Emissions from upstream leased assets (data centres) were calculated based on electricity consumption or, where unavailable, estimated using standardised power assumptions, applying country-specific electricity emission factors from ADEME.

Use of sold products: emissions related to the use of sold products (within the 74Software scope) were estimated using standardised IT architecture models and extrapolated across product lines based on annualised upfront revenues as at 31 December 2025. For customer-managed products, energy consumption was modelled using reference server architectures and customer size segmentation based on contractual entitlements. Production and non-production environments were estimated using standardised load assumptions. Server energy consumption was calculated using recognised modelling tools and technical specifications (CPU, RAM, load), with country-specific electricity emission factors sourced from the ADEME database based on billing location. The same modelling approach was applied to SBS products, with product-specific benchmarks used where appropriate.

Excluded Scope 3 categories: given 74Software's business model, the Group does not have capital goods, downstream leased assets, franchises, investments or other relevant upstream indirect assets. As the Company does not manufacture physical products, upstream and downstream transportation and distribution, processing of sold products, and end-of-life treatment of sold products are also considered not applicable.

In 2025, 74Software decided to recalculate and republish its 2024 greenhouse gas (GHG) emissions. This decision followed the update of emission factors by *Agence de la transition écologique* (ADEME), France's national public agency dedicated to the ecological transition. The previously applicable emission factors were archived and replaced with updated factors, which have been made available retroactively for prior reporting years. 74Software applied the updated emission factors to its 2024 inventory to ensure alignment with the most recent scientific and regulatory references. The recalculation also incorporates updated energy consumption data for offices located in Bulgaria, Luxembourg and France (Paris), as well as revised company car energy consumption data for India, the Netherlands, Belgium and Luxembourg. The recalculated 2024 GHG emissions constitute the reference base year for 74Software's commitments under the Science Based Targets initiative (SBTi).

⁽¹⁾ A more detailed Methodology note is provided at the end of the ESRS E1 section.

Total GHG emissions disaggregated by Scopes 1 and 2 and significant Scope 3

	2024 published			2024 recalculated			2025		
	Axway	SBS	Total 74Software	Axway	SBS	Total 74Software	Axway	SBS	Total 74Software
Gross Scope 1 GHG emissions (tCO ₂ eq)	381	947	1,328	291	1,625	1,916	154	1,607	1,761
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	–	–	–	–	–	–	–	–	–
Gross location-based Scope 2 GHG emissions (tCO ₂ eq)	1,079	2,769	3,848	1,091	2,825	3,916	761	2,240	3,001
Gross market-based Scope 2 GHG emissions (tCO ₂ eq)	NA	NA	NA	NA	NA	NA	416	2,306	2,722
Total Gross location-based indirect (scope 3) GHG emissions (tCO₂eq)	39,034	22,409	61,443	33,439	19,649	53,088	31,033	19,424	50,458
Total Gross market-based indirect (scope 3) GHG emissions (tCO₂eq)	NA	NA	NA	NA	NA	NA	30,977	19,261	50,238
1. Purchased goods and services	16,100	18,953	35,054	10,440	16,004	26,444	8,567	13,886	22,453
[Optional sub-category: Cloud computing and data centre services]	–	–	–	–	–	–	–	–	–
2. Capital goods	–	–	–	–	–	–	–	–	–
3. Location-based fuel and energy-related activities (not included in Scope1 or Scope 2)	185	529	715	252	719	971	97	478	575
3a. Market-based fuel and energy-related activities (not included in Scope1 or Scope 2)	NA	NA	NA	NA	NA	NA	41	315	356
4. Upstream transportation and distribution	–	–	–	–	–	–	–	–	–
5. Waste generated in operations	107	323	431	107	324	431	25	55	80
6. Business travel	1,112	775	1,888	1,112	776	1,888	1,497	1,071	2,568
7. Employee commuting	481	1,826	2,307	481	1,826	2,307	584	1,590	2,173
8. Upstream leased assets	–	–	–	–	–	–	149	236	384
9. Downstream transportation	–	–	–	–	–	–	–	–	–
10. Processing of sold products	–	–	–	–	–	–	–	–	–
11. Use of sold products	20,641	NA	20,641	20,641	NA	20,641	20,115	2,109	22,225
12. End-of-life treatment of sold products	–	–	–	–	–	–	–	–	–
13. Downstream leased assets	–	–	–	–	–	–	–	–	–
14. Franchises	–	–	–	–	–	–	–	–	–
15. Investments	–	–	–	–	–	–	–	–	–
16. Other upstream indirect emissions*	406	–	406	406	–	406	–	–	–
TOTAL GHG EMISSIONS (LOCATION-BASED) (TCO₂EQ)	40,494	26,124	66,619	34,821	24,100	58,920	31,948	23,271	55,220
TOTAL GHG EMISSIONS (MARKET-BASED) (TCO₂EQ)	NA	NA	NA	NA	NA	NA	31,547	23,174	54,722

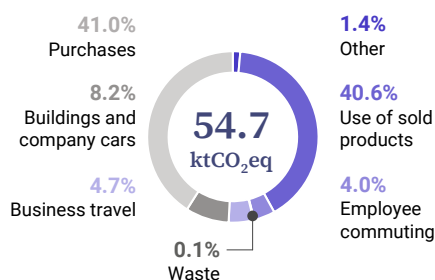
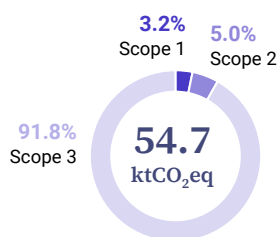
* In 2024 the external data centres electricity consumption was reported in 3-16 Other upstream indirect emissions, while in 2025 they are reported in 3-8 Upstream leased assets.

74Software's Scope 1 and emissions decreased by 8.1% in 2025 compared to 2024, reflecting the company's continued efforts to improve the impact of its company vehicles. Scope 2 location-based emissions decreased by 23.4%, reflecting the Group's actions to optimise office space. In 2025, the emissions associated with the use of sold products cover the scope of 74Software, while in 2024 they were calculated for Axway only.

In 2025 6% of the Scope 3 emissions were calculated using primary data.

74Software is not subject to regulated emission trading schemes.

Market-based Greenhouse Gas Emissions Assessment



**CARBON INTENSITY
MARKET-BASED**

0.0774

tCO₂eq/k€

GHG intensity per net revenue	2024 (published)	2024 (recalculated)	2025
Net revenue (in k€)	690,043	690,043	707,220
Total GHG emissions (location-based) per net revenue (in tCO₂eq/k€)	0.1	0.0854	0.0781
Total GHG emissions (market-based) per net revenue (in tCO₂eq/k€)	–	–	0.0774

2.2.8 GHG removals and GHG mitigation projects financed through carbon credits (E1-7)

In 2025, 74Software did not finance any GHG removal or GHG mitigation projects through carbon credits.

2.2.9 Internal carbon pricing (E1-8)

74Software did not implement an internal carbon pricing mechanism.

Methodology of GHG emissions by scope (detailed note):

Scope 1:

Stationary combustion: direct emissions from stationary combustion sources are calculated using energy consumption data per site and fuel type. Data were collected directly from the sites whenever possible. Except for France, most natural gas and fuel oil consumption was evaluated using an average European emission factor. Emission factors are sourced from the ADEME Base Empreinte® database, with specific factors applied for natural gas and fuel oil. The methodology involves converting LHV to HHV using energy-specific ratios.

Mobile combustion: direct emissions from mobile sources are calculated using fuel and electricity volumes for electric vehicles recorded via company payment cards, consolidated by 74Software. Volumes (litres for gasoline/diesel and kWh for electricity) are summed by fuel type. Extrapolations were sometimes applied when the number of vehicles was known but consumption data were unavailable (Axway Italy, SBS Netherlands). By default,

hybrid vehicles are included with gasoline vehicles. Emission factors are sourced from Base Empreinte, with distinct factors depending on the fuel type or the country's electricity mix. For SBS India company cars, fuel consumption was estimated through extrapolation based on the reported fuel expenditure and the average fuel price applicable to the Noida region during the reporting period. Given that approximately 97% of the vehicle fleet in India operates on gasoline, it was conservatively assumed that all company cars were gasoline-powered for the purpose of the calculation. Due to the exhaustiveness of the data, the mobile combustion emissions are subject to some level of uncertainty.

Fugitive emissions: direct fugitive emissions are calculated using the total or recharged weight of refrigerants per site, collected via a data collection table. Emission factors come from Base Empreinte for R-134a, R-410a, and R-22 refrigerants. When the actual quantity of leaked fluid is known, this data is used. If a site has air conditioning but the type or quantity of refrigerant is unknown, it is assumed to be R-410a (the refrigerant with the most available data), and the quantity is extrapolated based on office surface area. When the refrigerant type is known but leak volumes are unknown, an average leak is estimated at 2.5% of the total assumed weight, following EPA guidelines.

Scope 2:

Electricity consumption: indirect emissions from electricity consumption were primarily calculated using electricity bills for most locations. Information on the share of renewable energy was collected from certificates. Where billing information was unavailable, consumption was extrapolated based on surface area. Emission factors were sourced from the ADEME Base Empreinte® database and takes into account the local electricity mix.

Heating and cooling consumption: indirect emissions from heating, cooling, or steam were calculated using consumption data measured in kilowatt-hours (kWh). For the site concerned in France (Trinity), specific emission factors provided by IDEX were applied for La Défense heating and cooling. In Bulgaria, as there is no specific emission factor for district heating, an average French emission factor for district heating and cooling was applied.

Scope 3:

Calculations were based on various data sources and methodologies, depending on the emissions category.

Fuel- and energy-related emissions (not included in Scope 1 or Scope 2): these emissions were computed using the ADEME calculator, based on energy consumption data.

Purchased goods and services: emissions from purchased goods and services were estimated using monetary data from the company's reporting tools. While this spend-based approach allows for a broad coverage of categories, it is recognised that it may lead to an overestimation of emissions compared to activity-based or supplier-specific data. In particular, at this stage, certain non-relevant expense categories could not be fully excluded from the spend perimeter, including intragroup transactions (SBS/Axway), taxes and duties, and personnel-related expenses, which are not directly associated with the purchase of goods or services. Certain categories were excluded, either because they are accounted for elsewhere (e.g. fuel) or because they are outside the scope of the calculation. Dell purchases were excluded from Axway monetary data, as a specific carbon report provided by Dell was used instead.

Waste generated in operations: waste emissions were calculated using input data provided by 74Software. By default, Axway's office in Paris – tower Trinity waste data was used as a reference, as it was considered complete and representative of a wide range of waste types. For offices where no data was available (or data was partial), a headcount distribution was made based on Axway Paris' figures (used as a reference because the details provided seemed complete and covered a significant proportion of waste types). ADEME emission factors were used exclusively and by default, the waste treatment method considered for all countries corresponds to an average end-of-life scenario for each treatment sector, in France. Due to the use of estimations, the results are subject to a medium level of uncertainty.

Business travel: emissions from business travel were mainly calculated using data provided by travel service providers. Where distance and CO₂ data were available, CO₂ data were used because their order of magnitude was consistent with ADEME emission factors, even though methodological details from suppliers were not always available. For journeys where only distance data was available, emissions were calculated by classifying flights into three categories: short-haul (< 500 km), medium-haul (500-1,500 km) and long-haul (> 1,500 km). For countries for which no data from providers was available, emissions were extrapolated based on headcount and average emissions per person. The extrapolation of rail emissions was only applied to European countries.

Employee commuting: employee commuting emissions were calculated using 2024 Axway survey and 2023 SBS survey data provided by 74Software. To reflect 2025 activity levels, emissions were adjusted using a distribution based on 2025 headcount.

Upstream leased assets (Data centers): emissions from external datacenters were calculated using electricity consumption data. In most cases, monthly instantaneous power data (kW) was provided. Datacenters were assumed to operate continuously throughout the year (around 8,760 hours). In some cases (Marcoussis, Paris Latitude, and Hemel Hempstead), emissions were estimated based on the number of CPUs, assuming an average power of 100 W per CPU, based on the average processor characteristics. The ADEME emission factor for each country's electricity mix has been applied.

For emissions related to the use of sold products, Axway and SBS products were considered in 2025. Emissions were estimated based on IT architecture requirements and extrapolated to product line emissions using 74Software financial data. This data reflects contracts signed as of 31 December 2025, and is therefore overestimated compared to actual annual revenue.

A) To estimate the energy consumption of customer-managed Axway products (APIM, AFAH, ST, and B2Bi), a standardised approach was developed and already applied for 2024 carbon footprint based on general assumptions. Customers were categorised into size buckets according to their entitled purchase metrics (transactions, records, or transfers), with actual product usage assumed to align with these entitlements. For Secure Transport (ST) and B2Bi, reference architectures were defined for each customer bucket, specifying server type, number, and characteristics. For AFAH and APIM, cloud architecture data from Axway Managed products was used, with estimations made for equivalent physical server specifications. Production environments served as the basis for B2Bi and AFAH architecture, with a 30% adjustment to account for non-production environments. For Secure Transport and APIM, non-production server consumption was estimated separately.

Product-specific adjustments were applied to refine energy consumption estimations. For Axway Financial Accounting Hub (AFAH), customers were segmented into four size categories based on entitled records, with standard architectures defined for each. Enterprise customers with unlimited entitlements were aligned with equivalent large-scale customer architectures. For APIM, a three-tiered customer size model was used, leveraging Axway Managed reference architectures for smaller customers and adjusting configurations for larger clients. A dedicated test was conducted for Automator, where a test virtual machine (VM) ran a representative workload to calculate energy consumption per point. The primary assumption was that the test VM accurately reflected the energy usage of customer VMs.

Server consumption was calculated using Datavizta, which estimates mean electrical consumption at 100% load based on CPU (TDP) and RAM specifications. For physical servers, Datavizta's "server impact" tool was used, with CPU and RAM values derived from the established assumptions. TDP values were sourced from Datavizta's CPU database, with specific processor TDPs applied for B2Bi. For cloud servers, Datavizta's "cloud impact" tool was utilised, using AWS instance types and load data as inputs. A "load parameter" was applied to adjust full-load Datavizta outputs to reflect partial-load consumption. Customer location was determined by billing country, and location-based

emission factors from the ADEME database were applied. The use of sold products for Axway Managed was extrapolated based on revenue from customer-managed products.

Load assumptions were standardised per product and size of customer, with 30-50% load applied for production environments and 5-7% for non-production environments.

B) The same methodology was applied to SBS products: namely Collection, MSF, SAB, SF, Loans and Amplitude. I can be noted these two specific cases: For Collection, an internal benchmark was used to evaluate CPU requirements and associated load. For MSF, customer management was assessed based on SaaS customers, whose usage is well known.

Excluded Scope 3 categories: 74Software does not have any capital goods, downstream leased assets, franchises, investments, or other upstream indirect emissions. As a result, these categories are not applicable to the Company. Given 74Software's business model and operations, these types of assets are not required, and the emissions associated with them are therefore non-existent. Additionally, since 74Software does not produce physical products, categories such as upstream transportation and distribution, downstream transportation, processing of sold products, and end-of-life treatment of sold products are also not applicable.

2.3 Resource Use and Circular Economy (ESRS E5)

2.3.1 Resource use and circular economy IROs (E5)

At 74Software, hardware infrastructure – including office equipment and data-centres assets – is essential for the development and delivery of software solutions to clients. Modern and reliable IT equipment underpins operational continuity, performance, and cybersecurity resilience. However, the production and disposal of electronic equipment are associated with environmental impacts – depletion of finite raw materials, and generation of electronic waste – one of the significantly growing waste streams globally.

Recognising these impacts, 74Software is progressively integrating circular economy principles into its hardware lifecycle management. The company focuses on extending products lifespans, minimising e-waste through responsible end-of-life management, and increasing recovery and recycling rates.

These initiatives are based on the information currently available within the organisation and reflect a progressive approach to the identification and assessment of resource use and circular economy impacts. While initial analyses have been performed, a fully comprehensive and exhaustive assessment covering all assets, activities and value-chain segments has not yet been completed.

This approach extends across the value chain. By embedding sustainability criteria in procurement processes, engaging suppliers

on responsible sourcing practices, and partnering with certified refurbishers and recyclers, 74Software promotes higher circularity and environmental performance beyond its direct operations.

Furthermore, no specific consultations have yet been conducted with potentially affected suppliers regarding these matters. Nevertheless, such steps are recognised as important and are intended to be integrated into future sustainability initiatives.

These efforts support compliance with relevant environmental standards and contribute to a more resource-efficient digital infrastructure.

Aligned with the company's broader environmental commitments – including its low-carbon trajectory – 74Software continues to enhance its hardware management practices. Through continuous improvement in equipment selection, maintenance, reuse, refurbishment, donation, and recycling, the company reinforces its ambition to reduce environmental impact while supporting a more resilient and sustainable technological ecosystem.

74Software recognises that further work will be required in future reporting periods to strengthen the completeness, consistency and formalisation of its assessment and stakeholder engagement processes in line with ESRS E5 requirements.

IROs	Impact -	Value Chain Location			Time Horizon		
		Upstream	Own operations	Downstream	Short term	Medium term	Long term
The contribution of electronic waste to resource depletion, pollution and long-term environmental harm		✓	✓	✓	✓	✓	✓

2.3.2 Policies related to resource use and circular economy (E5-1)

IROs

The contribution of electronic waste to resource depletion, pollution and long-term environmental harm.

Impact -

Policy

74Software has established a structured approach to waste and e-waste management, centred on minimising environmental impact and supporting a circular economy. This approach is primarily governed by the Group's Code of Ethics and Environmental & Digital Sustainability Policy, which set out the core principles for responsible end-of-life management of electronic equipment.

These policies emphasise systematic collection, reuse and donation, refurbishment and recycling of electronic equipment through certified e-waste management partners, with the objective of reducing waste generation and limiting environmental harm.

In addition, the Supplier & Partner Charter complements these policies by promoting circular-economy practices and responsible sourcing throughout the supply chain, encouraging suppliers and partners to align with the Group's environmental and sustainability expectations.

Through this framework, 74Software's policies seek to support sustainable and low-impact operations.

Programmes

All electronic waste at 74Software is collected by certified partners, ensuring responsible processing and enabling reuse, refurbishment, and recycling. Most of the e-waste is recycled (see 3.3.5). Where reuse was possible, obsolete equipment was donated to employees during the reporting period, contributing to circular-economy practices.

74Software is committed to minimising environmental impact, particularly in relation to e-waste as a material topic for the Group.

In line with the Supplier & Partner Charter, components are sourced from suppliers committed to reducing the environmental impact of their activities, sites, products and/or services. This includes reducing greenhouse gas emissions, preserving natural resources by controlling water, energy and raw materials consumption, promoting the circular economy, and limiting waste production. Supplier selection prioritises those who incorporate recycled materials, minimise the use of critical and scarce minerals (such as those in IT hardware), and comply with international standards for conflict minerals.

The Code of Ethics embeds the responsible end-of-life of electronic equipment, including extend of its life through reuse and donation, encouraging circular practices with the Group's suppliers and throughout its own operations.

The Environmental and Digital Sustainability Policy emphasises the importance of reducing the environmental footprint of the company's digital products and activities, including energy efficiency, resource use and waste reduction, thus reducing the greenhouse gas emissions through continuous improvement approach.

Through these actions, alongside with minimising its environmental footprint and supporting a more circular economy, the 74Software aims to go beyond compliance by encouraging sustainability into the corporate culture, governance, and long-term business strategy.

The Board of Directors oversees the Group's sustainability-related strategy, including policies addressing resource use and circular economy matters. The Executive Committee is responsible for ensuring effective implementation of these policies across the organisation. The Group's policies related to resource use and circular economy are informed by recognised international frameworks and standards, including:

- the United Nations Global Compact and its ten principles, particularly those relating to environmental responsibility and sustainable resource management;
- the Greenhouse Gas Protocol, for emissions measurement linked to resource and energy use;
- the Science Based Targets initiative (SBTi), ensuring alignment with a 1.5°C trajectory;
- international standards and regulations relating to responsible sourcing, including conflict minerals requirements;
- applicable European Union environmental regulations, including those governing waste electrical and electronic equipment (WEEE), where relevant.

In addition, the Group's ecodesign approach for digital services refers to recognised frameworks such as the French *Référentiel Général d'Ecoconception des Services Numériques* (RGESN).

In defining and updating its resource use and circular economy policies, 74Software considers the interests and expectations of key stakeholders, including:

- clients, who increasingly expect responsible digital solutions and secure, sustainable IT lifecycle management;
- employees, particularly those involved in procurement, IT asset management and digital development;
- suppliers and service providers, who are required to align with the Group's responsible sourcing and circularity expectations;
- shareholders and investors, who expect transparency on environmental risks and resource efficiency;
- regulators and public authorities, particularly in jurisdictions where environmental and waste regulations apply.

Stakeholder expectations are taken into account through ongoing dialogue, supplier engagement processes, regulatory monitoring, and sustainability reporting.

The Code of Ethics and Supplier and Partner Charter are publicly available on the CSR page of 74Software's website. The Environmental and Digital sustainability policy is available to all employees on the internal communication platforms. Externally, suppliers and partners are required to adhere to the Supplier & Partner Charter, which is shared as part of contractual documentation and due diligence processes. The Group may request evidence of compliance and reserves the right to conduct audits where appropriate. Through these communication and engagement mechanisms, 74Software ensures that stakeholders who may be affected by, or are required to contribute to, the implementation of its resource use and circular economy policies are appropriately informed.

2.3.3 Actions and resources related to resource use and circular economy (E5-2)

74Software collaborates with recycling companies to ensure the responsible processing and recycling of electronic equipment. This partnership extends the lifecycle of IT assets, maximises the recovery of valuable materials, reduces the environmental impact of electronic waste, and promotes sustainable practices within the industry.

In 2025, as part of data centres optimisation projects in France, Ireland and Romania, 74Software partnered with Hewlett Packard Enterprise to manage decommissioned electronic equipment. Through this collaboration 93.67 kg of equipment were refurbished for continued use, and 2,095.26 kg were recycled through certified treatment processes. Compared to landfill disposal, these actions resulted in an estimated avoidance of 58,161.5 kg CO₂eq, based on supplier-provided methodology. This partnership significantly contributes to sustainability efforts and reduces the carbon footprint associated with IT equipment disposal.

In addition, 3,146.94 kg of e-waste generated at office level was recycled through certified local waste treatment providers.

Beyond recycling initiatives, 74Software donates obsolete IT equipment to employees and charitable organisations through a structured process. Equipment release requests are initiated by relevant stakeholders, and the Accounting Department verifies the purchase date to ensure compliance with tax regulations. The IT Department assesses the equipment's condition and determines if repairs are required. Once all personal data has been securely erased, final compliance checks are conducted before equipment is donated.

In 2025, more than 500 obsolete laptops (855.44 kg) were donated to employees, extending product life and preventing premature disposal.

For the current reporting period, 74Software is not in a position to disclose the financial impacts associated with its circular economy initiatives. The relevant financial data is not yet available, in line with applicable phase-in provisions. In the future disclosures, as part of the ongoing efforts to enhance transparency, the Company is committed to allocate resources and develop a structured financial reporting related to circular economy actions.

Key topic	Action description	Scope of Action (2025)	Time Horizon	Progress Updates
End-of-life of hardware equipment – treatment	Managing the end-of-life of data centres hardware equipment. This includes a partnership with Hewlett Packard Enterprise for data centres equipment recycling and refurbishment.	74Software	Short term	Hewlett Packard Enterprise’s solution for IT equipment waste resulted in recycling of 2,095.26 kg data centres’ e-waste (France, Ireland, Romania) and avoided environmental impact of 58,161.5 kg CO ₂ emissions. In 2025, 77.5% of the total collected e-waste was recycled.
	Managing the end-of-life of laptops, mobile phones, monitors and other office IT equipment to ensure responsible disposal and recycling. This includes partnerships with local recycling companies.	74Software	Short term	Local certified e-waste treatment providers across our sites recycled 3,146.94 kg of office IT equipment. In 2025, 77.5% of the total collected e-waste was recycled.
End of life of hardware equipment – donations	Donation of obsolete IT equipment to employees and charitable organisations, including the donation of 500+ obsolete laptops in 2025.	74Software	Short term	Each year, the IT Department and the local Accounting teams, conducts an evaluation of the office’s IT equipment. During this assessment, any equipment identified as obsolete or no longer suitable for business use is considered for donation. The proposed donations are offered to employees or charitable organisations, ensuring that the equipment continues to serve a useful purpose. This entire process is carried out following a structured procedure, which includes proper documentation, approval workflows, and compliance with relevant company policies and regulatory requirements. By adhering to this systematic approach, the company ensures transparency, accountability, and the responsible disposal of outdated IT assets.
Maintainability of Software	Ensuring that our software is designed for durability, repairability, and up gradability	74Software	Short term	Reviewed yearly as part of the Digital Sustainability strategy, including conduct of life-cycle assessments (LCAs) for selected flagship products hosted on AWS during performance testing phases, in line with ISO 14040/14044 standards, the GHG Protocol ICT Sector Guidance and BOAVIZTA methodologies.

2.3.4 Targets related to resource use and circular economy (E5-3)

74Software has not yet adopted specific measurable outcome-oriented targets relating to e-waste reduction. Subject to improved data maturity and consolidation at Group level, the company intends to assess the feasibility of defining quantitative targets related to e-waste management in the medium term. At this stage, 74Software has not defined quantitative targets specific to e-waste due to the ongoing centralisation of the IT asset management and improvements in data quality and traceability of end-of-life equipment flows. Nevertheless, the Group continues to manage e-waste through preventive and circular practices, including reuse, donation and certified recycling. The effectiveness

of the Group’s resource use and circular economy policies is monitored through qualitative and operational indicators, including:

- volume of donated IT equipment;
- engagement with certified recycling partners;
- compliance with data destruction and environmental standards;
- supplier adherence to the Supplier & Partner Charter;
- periodic review of procurement and asset management practices.

These elements contribute to mitigating environmental risks associated with electronic waste and responsible sourcing. Effectiveness is monitored through:

- IT asset management processes at entity level;
- procurement due diligence aligned with the Supplier & Partner Charter;
- contractual requirements with certified waste management providers;
- internal reporting;
- periodic review of environmental policies by the Executive Committee.

The company retains documentation from service providers (e.g., recycling certificates, data destruction attestations).

While no quantitative reduction target has been formally defined yet, 74Software's qualitative level of ambition is to optimise the useful life of electronic equipment, prioritise reuse and internal redeployment before recycling, ensure environmentally sound and compliant treatment of end-of-life equipment, and encourage responsible sourcing practices across the value chain. Indicators used to assess progress include share of decommissioned equipment reused or donated, confirmation of treatment by certified recycling partners, and supplier compliance with responsible sourcing requirements.

The base year for measurable outcome-oriented targets has been defined yet. As of the reporting date, 74Software has not adopted specific quantitative targets relating to e-waste generation reduction, circularity rate of IT equipment, and use of recycled materials in IT assets. Not having adopted targets is mainly due to the ongoing centralisation of equipment management.

2.3.5 Resource inflows and outflows (E5-4 and E5-5)

As a software company, resource inflows are not considered material for 74Software. With respect to resource outflows, electronic waste represents the most significant waste stream generated by 74Software's operations. Other hazardous and non-hazardous waste streams are not considered material to the Group.

In 2025, data collection efforts focused on electronic waste generated by office equipment and IT hardware across all 74Software sites, based on information provided by local entities and certified waste management partners. While this scope does not yet guarantee full exhaustiveness, it represents a significant improvement compared to 2024, when the scope was more limited, and enhances the overall completeness and reliability of the disclosed e-waste data. For several sites full

completeness still cannot be guaranteed (e.g. Cameroon, Germany, Hong Kong, Italy, Ivory coast, Lebanon, Morocco, the Netherlands, Senegal, Sweden, Tunisia, UAE, USA). In 2024 the scope covered Axway's offices in Paris and Sofia, as well as the e-waste collected during the relocation of Axway's data centres in France and Romania.

Among the available data, the proportion of recycled e-waste increased substantially, rising from 63% in 2024 to 77.5% in 2025. The total amount of non-recycled e-waste is 552.0 kg representing 8.2% of the total amount of e-waste.

Overall, 91.8% (6,213.4 kg) of electronic equipment was valorised (through reuse, recycling, and refurbishment), reflecting 2025's continued progress in the Group's circular economy approach.

	2024	2025
Total amount of electronic equipment diverted from disposal (kg)	992.3	6,213.4
Of which reused (kg)	N/A	877.5
Of which recycled (kg)	992.3	5,242.2
Of which treated by other recovery operations (kg)	N/A	93.7
The amount of electronic equipment directed to disposal (kg)	581.0	552.0
Of which incinerated (kg)		
Of which sent to landfill (kg)	74Software does not have this level of information.	74Software does not have this level of information.
Of which sent to other disposal operations (kg)		
TOTAL AMOUNT OF E-WASTE GENERATED	1,573.3	6,765.4

2.3.6 Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities (E5-6)

74Software has not been able to calculate the financial effects of the negative impacts related to e-waste for the year 2025.

2.4 EU Taxonomy

Regulatory context

In order to promote transparency and a long-term vision of economic activities while directing capital flows to sustainable investments, the European Union established a common classification system for Company activities enabling the identification of economic activities considered sustainable. This system is defined in European Regulation (EU) 2020/852 of 18 June 2020, known as the "One to Watch Taxonomy Regulation". This regulation was supplemented by the delegated act of 13 June 2023 which defines new climate-related activities and completes the new targets.

Companies must publish the proportion of revenue, capital expenditure and operating expenditure associated with economic activities that are:

- "eligible", *i.e.* classified in the European Taxonomy;
- "aligned" or "sustainable", *i.e.* comply with the technical criteria related to each of the eligible activities: make a substantial contribution to one of the six environmental objectives, do no harm to the other five environmental objectives and comply with minimum social safeguards.

For 2025, companies must again report on three full taxonomy indicators (eligibility and alignment) relating to six climate-related objectives (climate change mitigation, climate change adaptation, water and marine resources, pollution, circular economy and biodiversity) and climate-related activities according to detailed tables published in June 2023.

The data is comparative to 2024 regarding the alignment of climate-related objectives (mitigation and adaptation).

The Company conducted an in-depth analysis of all its activities in its various consolidated entities. This analysis was performed jointly by the CSR Department, the Finance Department and Operating Departments.

Scope

On 1 September 2024, Axway completed the acquisition of SBS Group and adopted a new corporate name: 74Software.

While the 2024 green taxonomy reporting was conducted on a constant scope basis and therefore excluded SBS's activities, the 2025 reporting now reflects the full perimeter of 74Software. For the first time, SBS's activities are included in the analysis. Accordingly, any comparison with 2024 figures should be interpreted in light of the fact that the 2024 reporting covered

only Axway's activities, whereas the 2025 reporting includes the full scope of 74Software, including SBS.

Accordingly, revenue, capital expenditure and operating expenditure for all activities of the Company within the scope of entities under its control have been taken into account.

The financial data has been extracted from the accounts as at 31 December 2025, as presented in the Consolidated Financial Statements.

Financial indicator calculation methodology

The financial ratio denominators were defined in accordance with the definitions set out in the Delegated Act of 6 July 2021 on Article 8 of the Taxonomy Regulation.

The eligibility ratios were determined by identifying the portion of the Company's revenue, capital expenditures and operating expenditures attributable to economic activities covered by the EU Taxonomy. This identification was performed through a mapping of financial data to Taxonomy-eligible activities, based on the nature of the Company's activities and the allocation of investments and operating costs to the relevant assets and processes.

To avoid double counting, each item of revenue, capital expenditure and operating expenditure was allocated to a single economic activity only, based on its primary purpose, ensuring that amounts were included only once in the numerator of the relevant key performance indicators.

Revenue by activity

At this stage of its deployment, the Taxonomy Regulation prioritises activities that have the most significant impact on climate change and that offer the greatest potential for reducing greenhouse gas emissions. To date, the Taxonomy has listed more than 100 activities accounting for 90% of greenhouse gas emissions and that therefore must make the greatest efforts to attain the EU commitment of reducing emissions by 55% by 2030 and being carbon neutral by 2050.

The regulation also sets out enabling activities, *i.e.* activities that contribute to adapting other activities by proposing products or solutions that enable the negative effects of current or future climate change to be avoided and/or limited.

74Software activities concerned

74Software is a software publisher and a major digital transformation player. The services provided as part of its Software activities comprise software user rights (licenses), maintenance, related services and Software as a Service type subscriptions.

To better meet its customers' expectations, 74Software has transformed its historical Software business model (License, Maintenance and Services), moving towards a "Software as a Service" subscription-based business model enabling the use of remote servers.

74Software's Subscription activity groups together two Software as a Service offerings:

- the "Own-managed software" offering, which includes the use of licenses, maintenance services and the hosting of all these services. In this offering, hosting is sub-contracted by 74Software to third-party hosting providers; and
- the "Customer-managed software" offering, which is a hybrid offering as the "on-premise" components (licenses) are hosted on the customer's premises or sub-contracted by the customer to a third-party hosting provider, while the other Software as a Service components are sub-contracted by 74Software to third-party hosting providers.

74Software's core business is software publishing. This transformation of its business model does not make 74Software a traditional hosting provider. In practice, hosting services are entirely sub-contracted by 74Software to leading hosting providers on the market, such as Amazon Web Services and Microsoft Azure.

This Cloud offering can provide customers with the means to achieve their own climate targets.

In addition, the Group selects leading hosting providers that have defined a low-carbon trajectory, aimed at reducing greenhouse gas emissions by 2030.

While 74Software does not yet have a formal climate change mitigation transition plan ensuring full compatibility with the transition to a sustainable economy and the limitation of global warming to 1.5°C in line with the Paris Agreement, nor with the objective of achieving climate neutrality by 2050 as set out in Regulation (EU) 2021/1119 (European Climate Law), 74Software has already taken significant structuring steps and is actively progressing towards this objective.

74Software has submitted its company-wide near-term greenhouse gas reduction targets to the Science-Based Targets initiative (SBTi). These targets include:

- a reduction of Scope 1 and Scope 2 GHG emissions by 42% by 2030 from a 2024 base year; and
- a reduction of Scope 3 GHG emissions by 25% by 2030 from the same base year.

The Company will publicly disclose its company-wide GHG inventory and progress against its SBTi-approved targets on an annual basis through its sustainability reporting, which will be subject to third-party audit. In addition, the Company will disclose this information annually through the CDP questionnaire.

74Software's objective is to have a climate change mitigation transition plan formally approved by its administrative, management and supervisory bodies for the 2027 financial year. This plan will be fully embedded in and aligned with the Group's overall business strategy and financial planning.

74Software identified its eligible activities with respect to six "Environmental objectives".

With respect to the "climate change mitigation" environmental objective, 74Software analysed the following activities:

- Activity 8.1 "Data processing, hosting and related activities": To analyse its eligibility with regard to the climate change mitigation objective, 74Software has drawn on the survey conducted by the trade union for digital companies in France, Numeum. In 2022, Numeum analysed the activities defined in Annex 1 of the climate delegated act, "Climate change mitigation", and compared them with those performed by its members. In its position paper, Numeum presented its interpretation to identify the activities it considered to be eligible under Annex 1: <https://numeum.fr/finance-fiscalite/note-de-position-sur-la-taxinomie-verte/>.

The following are eligible:

- data storage and processing activities are performed in the Company's own infrastructure. When leasing or co-leasing a data centre room owned by a service provider, the Company controls the specifications for the equipment and rooms;
- the specific revenue relating to data storage and processing activities can be broken down by Company;
- this revenue is generated as a principal and not as an agent (the Company does not limit itself to a purchase to sell the hosting service).

74Software sub-contracts all its hosting services in its Software as a Service offerings and the Company does not control the specifications on third party infrastructures. Furthermore, the Company does not distinguish between data storage and processing activities. 74Software's related activities are not currently eligible under activity 8.1.

- Activity 8.2 "Data-driven solutions for GHG emissions reductions": the nature of 74Software's offering would not appear to directly meet the definition of this article. However, as 74Software is a digital transformation player, certain projects could be eligible provided they are supported by specific analyses demonstrating substantial greenhouse gas emission savings. At this stage, the Company has not recognised the eligibility of its revenue under activity 8.2.

With regard to the "**Climate change adaptation**" environmental objective, 74Software analysed activity 8.1 "Data processing, hosting and related activities" and activity 8.2 "Computer programming, consultancy and related activities".

At this stage of the regulation, these activities 8.1 and 8.2 do not constitute enabling activities within the meaning of Regulation (EU) 2020/852.

With regard to the environmental objectives "**Water and marine resources**" and "**Circular economy**", the Company respectively analysed the activities 4.1 "Provision of IT/OT data-driven solutions

for leakage reduction" and 4.1 "Provision of IT/OT data-driven solutions". The nature of the 74Software offering does not appear to directly comply with the definition of these articles.

At this stage, 74Software has not recognised the eligibility of its revenue under activities 4.1.

Finally, the Company considers that the environmental objectives "**Pollution**" and "**Biodiversity and ecosystems**" have no connection with its activities.

74Software has not therefore recognised its revenue as eligible with regard to all the environmental objectives.

74Software's analysis leads us to conclude that 74Software's activities do not fall within the highest greenhouse gas emitting activities targeted by the Taxonomy. At the same time, 74Software's activities are not considered enabling activities. Nonetheless, the Company is implementing progress actions in favour of the climate, the results of which are measured through performance indicators published in the Non-Financial Performance Statement (or this document).

To conclude, 74Software's economic activities do not substantially contribute to the six environmental objectives. The proportion of revenue associated with eligible and aligned sales is therefore nil in fiscal year 2025. The proportion of revenue associated with eligible sales was nil in fiscal year 2024.

The regulatory model for 2025 revenue is presented below:

<i>(in thousands of euros)</i>		2025	Substantial contribution criteria							DNSH criteria (Do No Significant Harm)									
Economic activities	Code(s)	Absolute revenue (in thousands of euros)	Proportion of revenue year Y	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards	Proportion of Taxonomy aligned (A.1) or eligible (A.2) revenue, year Y-1	Category (enabling activity)	Category (transitional activity)
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Revenue of environmentally sustainable activities (Taxonomy-aligned) (A.1)		—	—%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	—%		
<i>Of which Enabling</i>		—	—%	—%	—%	—%	—%	—%	—%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	—%	N/A	
<i>Of which Transitional</i>		—	—%	—%	—%					N/A	N/A	N/A	N/A	N/A	N/A	N/A	—%		N/A
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
				Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL										
Data processing, hosting and related activities		8.1	—	—%	N/EL	N/EL	N/EL	N/EL	N/EL								—%		
Data-driven solutions for GHG emissions reductions		8.2	—	—%	N/EL	N/EL	N/EL	N/EL	N/EL								—%		
Provision of IT/OT data-driven solutions for leakage reduction		4.1	—	—%	N/A	N/A	N/EL	N/A	N/A								—%		
Provision of IT/OT data-driven solutions		4.1	—	—%	N/A	N/A	N/A	N/A	N/EL								—%		
Revenue of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		—	—%	—%	—%	—%	—%	—%	—%								—%		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
License		44,404	6%																
Subscription		355,314	50%																
Maintenance		175,820	25%																
Services		131,682	19%																
TOTAL (A + B)		707,220	100%																

Non-eligible activities refer to Note 3.1 to the Consolidated Financial Statements. 74Software Consolidated Revenue was amounted to €707,2 million of which €337,9 million for Axway and €371,2 million for SBS.

Capital Expenditure – CapEx

Capital expenditure corresponds to capitalised costs in respect of intangible assets and property, plant and equipment, including IFRS 16 right-of-use assets.

74Software eligible capital expenditure concerns private cars, IT servers and the right to use leased buildings.

74Software eligible CapEx in 2025 accounted for 42.2% of total CapEx of €45.4 million (see Notes 8.4 and 9.1 to the Consolidated Financial Statements). In 2024, eligible CapEx accounted for 63.5% of total CapEx of €6.5 million, based on a more limited scope that covered only Axway's activities, as SBS was excluded from the 2024 reporting perimeter.

The Company assessed whether its investments complied with the technical screening criteria and concluded that certain CapEx contributed substantially to the achievement of one of the two climate change "adaptation" and climate change "mitigation" objectives. 74Software therefore conducted additional investigations concerning the Do No Significant Harm (DNSH) criteria and compliance with minimum social safeguards.

With regard to the vehicle fleet, sustainable capex involves hybrid and electric vehicles for which the leased asset rights of use were accounted for in 2025 in the amount of €1.7 million, compared to €0.2 million as in 2024. The 2024 figure was based on a more limited reporting scope, as it covered only Axway's activities, with SBS excluded from the reporting perimeter.

In 2025, the Company made significant investments in office buildings, amounting to €16.9 million and representing 42.3% of total capital expenditures. Eligible CapEx accounted for 32% of total CapEx, which amounted to €40 million.

Following the acquisition of SBS by Axway in September 2024, 74Software the Company decided to extend its offices in Paris La Défense, located within premises holding dual environmental certifications (HQE "Exceptional" and BREEAM "Excellent") and compliant with RT 2012 Thermal Regulations. A memo published by the Department for Development, Housing and Nature (DGALN) states that "With regard to the energy assessment of the current housing stock by the ministry's statistics department, reporting to the General Commission for Sustainable Development Durable (CGDD), based on the new energy performance analysis that is mandatory since 1 July 2021, the top 15% most efficient housing can be considered as housing with a standard primary energy consumption of less than 135 kWh/m²/year".

Eligible activity	Technical screening criteria for the climate change mitigation objective
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	<p>a. for vehicles of category M1 and N1, both falling under the scope of Regulation (EC) No 715/2007:</p> <ul style="list-style-type: none"> - until 31 December 2025, specific emissions of CO₂, as defined in Article 3(1), point (h), of Regulation (EU) 2019/631, are lower than 50gCO₂/km (low- and zero-emission light-duty vehicles), - from 1 January 2026, specific emissions of CO₂, as defined in Article 3(1), point (h), of Regulation (EU) 2019/631, are zero; <p>b. for vehicles of category L, the tailpipe emissions equal to 0g CO₂eq./km calculated in accordance with the emission test laid down in Regulation (EU) 168/2013.</p>
7.7 Acquisition and ownership of buildings	<p>For buildings built before 31 December 2020, the building has at least an Energy Performance Certificate (EPC) class A. As an alternative, the building is within the top 15% of the national or regional building stock expressed as operational Primary Energy Demand (PED) and demonstrated by adequate evidence, which at least compares the performance of the relevant asset to the performance of the national or regional stock built before 31 December 2020 and at least distinguishes between residential and non-residential buildings.</p> <p>For buildings built after 31 December 2020, the building meets the criteria specified in Section 7.1 of this Annex that are relevant at the time of the acquisition.</p> <p>Where the building is a large non-residential building (with an effective rated output for heating systems, systems for combined space heating and ventilation, air-conditioning systems or systems for combined air-conditioning and ventilation of over 290 kW) it is efficiently operated through energy performance monitoring and assessment.</p>
8.1 Data processing, hosting and related activities	<p>The activity has implemented all relevant practices listed as: expected practices in the most recent version of the European Code of Conduct on Data Centre Energy Efficiency, or in CEN-CENELEC document CLC TR50600-99-1 "Data centre facilities and infrastructures – Part 99-1: Recommended practices for energy management".</p> <p>The implementation of those practices is verified by an independent third-party and audited at least every three years.</p> <p>The global warming potential (GWP) of refrigerants used in the data centre cooling system does not exceed 675.</p>

The regulatory model for 2025 CapEx is presented below:

—%		2024		Substantial contribution criteria							DNSH criteria (Do No Significant Harm)									
Economic activities	Code(s)	Absolute CapEx (in thousands of euros)	Proportion of CapEx year Y	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Minimum safeguards	Proportion of Taxonomy aligned (A.1) or eligible (A.2) CapEx, year Y-1	Category (enabling activity)	Category (transitional activity)	
				Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	H	T	
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1 Environmentally sustainable activities (Taxonomy-aligned)																				
				Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL											
Transport by motorbikes, passenger cars and light commercial vehicles	6.5	342	1%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	N/A	N/A	N/A	N/A	N/A	Y	3%			
Acquisition and ownership of buildings	7.7	12,984	29%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	N/A	N/A	N/A	N/A	N/A	Y	—%			
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		13,326	29%	29%	N/A	N/A	N/A	N/A	N/A	Y	N/A	N/A	N/A	N/A	N/A	Y	3%			
<i>Of which Enabling</i>		—	—%	—%	—%	—%	—%	—%	—%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	—%	N/A		
<i>Of which Transitional</i>		—	—%	—%	—%					N/A	N/A	N/A	N/A	N/A	N/A	N/A	—%		N/A	
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
				Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL											
Transport by motorbikes, passenger cars and light commercial vehicles	6.5	1,392	3%	Y	N/EL	N/EL	N/EL	N/EL	N/EL										4%	
Acquisition and ownership of buildings	7.7	3,944	9%	Y	N/EL	N/EL	N/EL	N/EL	N/EL										25%	
Data processing, hosting and related activities	8.1	504	1%	Y	N/EL	N/EL	N/EL	N/EL	N/EL										3%	
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		5,839	13%	13%	—%	—%	—%	—%	—%										32%	
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
CapEx of Taxonomy-non-eligible activities (B)		26,258	58%																	
TOTAL (A + B)		45,423	100%																	

Operating Expenditure – OpEx

Operating expenditure is defined as direct costs that cannot be capitalised and includes research and development expenditure, building renovation costs, maintenance and repair costs, lease payments expensed in the income statement and all other expenditure relating to the everyday maintenance of assets. It represents the denominator for the OpEx KPI calculation for a total of €200.7 million in 2025, compared to €79.9 million in 2024, the latter reflecting only Axway's activities, as the 2024 reporting was prepared on a constant scope basis and excluded SBS.

Research and Development expenditure totalled €167.9 million in 2025, compared to €57.5 million in 2024, and is not eligible as the revenue to which it relates is not eligible.

Eligible 74Software operating expenditure mainly concerns short-term leases of private cars.

The proportion of eligible 74Software operating expenditure in 2025 was 0% as in 2024.

The regulatory model for 2025 OpEx is presented below:

DNSH criteria

—%	2025	Substantial contribution criteria						DNSH criteria (Do No Significant Harm)					Minimum safeguards				
		Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity and ecosystems	Proportion of Taxonomy aligned (A.1) or eligible (A.2) OpEx, year Y-1	Category (enabling activity)	Category (transitional activity)	
		Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	H	T

A. TAXONOMY-ELIGIBLE ACTIVITIES

A.1 Environmentally sustainable activities (Taxonomy-aligned)

OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)	—	—%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	—%	
Of which Enabling	—	—%	—%	—%	—%	—%	—%	—%	—%	N/A	N/A	N/A	N/A	N/A	N/A	—%	N/A
Of which Transitional	—	—%	—%	—%						N/A	N/A	N/A	N/A	N/A	N/A	—%	N/A

A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)

			Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL									
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)	—	—%	—%	—%	—%	—%	—%	—%								—%	

B. TAXONOMY-NON-ELIGIBLE ACTIVITIES

OpEx of Taxonomy-non-eligible activities (B)	200,703	100%
TOTAL (A + B)	200,703	100%

2.5 Own Workforce (ESRS S1)

2.5.1 Own workforce IROs (S1)

Employees are the foundation of 74Software's success. 74Software's approach to its own workforce is designed to support fair working conditions, open dialogue and long-term employability across the Group, while ensuring a safe, respectful and inclusive working environment.

While the software industry presents unique challenges, 74Software is committed to implementing positive initiatives that benefit the entire workforce. The Company's double materiality analysis addresses key topics such as data privacy, working hours, and work-life balance, recognising their significant impact on employees. Diversity, gender equality, equal pay, and the inclusion of individuals from diverse backgrounds remain at the heart of its commitments. The Company acknowledges the importance of these issues, particularly for underrepresented groups, which are addressed across several impacts, risks and opportunities notably those related to diversity and equal opportunities, measures against workplace violence and harassment, work-life balance, adequate wages, and access to training and skills development, and actively promotes a culture of inclusivity. As part of this effort, 74Software has implemented strict measures to prevent violence and harassment, ensuring a safe, respectful, and supportive working environment.

Social dialogue, freedom of association, workers' rights, and collective bargaining play a crucial role in ensuring that diverse perspectives are represented and valued. 74Software places significant emphasis on training and skills development, recognising their importance not only for employee growth but also for broader

societal impact. Health and safety remain a top priority, with a strong commitment to maintaining a secure and compliant working environment. In addition, the Company actively promotes a balanced work-life culture, fostering employee well-being and enhancing overall productivity.

74Software's strategy and business model have a direct impact on its workforce, particularly in areas such as well-being, diversity, and work-life balance. These factors are critical to talent retention and employee engagement.

Following the acquisition of SBS by Axway in September 2024, 74Software is actively developing a fully aligned workforce strategy. During 2025, 74Software accelerated this work with the appointment of a new Group Chief Human Resources Officer (CHRO) and the launch of a renewed Group-wide HR organisation, supporting a more unified approach across the Group to workforce policies and disclosures. As part of this transition, the Company progressed in defining and aligning workforce governance to mitigate identified risks, ensuring alignment with the Company's broader strategy and IRO findings. These initiatives will ensure that all employees materially impacted by the Company's operations are included.

Furthermore, while 74Software works with non-employee service providers (such as contractors and subcontractors), these individuals are managed through contractual arrangements. The primary material impacts identified in the IRO pertain to direct employees.

See table below:

IROs	Value Chain Location			Time Horizon		
	Upstream	Own operations	Downstream	Short term	Medium term	Long Term
<p>Working conditions – Secure Employment Insecure employment fosters high turnover, team instability, and skill gaps, hindering skill development. It damages Company's reputation and results in higher costs for retraining, compensating, or recruiting staff.</p>		✓		✓		
<p>Working conditions – Working time Long working hours decrease productivity, increase workplace errors, and lead to higher absenteeism and turnover. Health issues and burnout raise medical costs and harm employee engagement, impacting financial performance.</p>		✓			✓	
<p>Working conditions – Work life balance Poor work-life balance results in decreased productivity, increased staff turnover, and lower job satisfaction. It weakens employee engagement and damages 74Software's long-term financial stability.</p>		✓		✓		
<p>Working conditions – Adequate wages Adequate wages attract and retain skilled employees, fostering motivation and job satisfaction. They enhance the Company's reputation as a responsible employer, ensuring long-term success.</p>		✓			✓	
<p>Open Dialogue – Social dialogue Poor social dialogue weakens trust and communication between employees and employers, leading to workplace conflicts, increased tension, and decreased morale.</p>		✓			✓	
<p>Open Dialogue – Freedom of association and collective bargaining Lack of freedom of association and collective bargaining limits workers' rights, making them vulnerable to unfair treatment. This increases stress, reduces job satisfaction, and negatively affects workplace relations.</p>		✓				
<p>Health and Safety Poor health and safety conditions raise injury risks, increase absenteeism, and cause stress-related illnesses, ultimately lowering productivity and employee morale.</p>		✓	✓		✓	
<p>Data privacy Failure to protect employee data privacy results in loss of trust, identity theft risks, and psychological distress, leading to reduced morale and productivity.</p>		✓		✓		
<p>Data privacy Failing to ensure data privacy for employees can expose 74S to significant financial risks, including regulatory fines, legal liabilities, increased operational costs for breach management, reputational damage leading to loss of business, and ongoing expenses for cybersecurity and compliance measures.</p>		✓				✓
<p>Diversity and Equal opportunities – Gender diversity Gender diversity fosters equal opportunities, reduces gender gaps, and promotes work-life balance, contributing to an inclusive workplace.</p>		✓			✓	
<p>Diversity and Equal opportunities – Diversity Workforce diversity improves social inclusion and provides opportunities for underrepresented groups. It reduces discrimination and enhances overall well-being and self-esteem.</p>		✓		✓		
<p>Diversity and Equal opportunities – Measures against violence and harassment Implementing anti-violence and harassment measures creates a safer work environment, reduces stress, and fosters a culture of respect and dignity, improving employee well-being.</p>		✓			✓	

IROs	Value Chain Location			Time Horizon		
	Upstream	Own operations	Downstream	Short term	Medium term	Long Term
<p>Talent recruitment, development and retention – Talent attraction</p> <p>Strong talent recruitment and retention strategies support workplace diversity, enhance employee satisfaction, and promote equal opportunities, creating a positive and engaged workforce.</p>		✓		✓		
<p>Talent recruitment, development, and retention – Talent attraction</p> <p>Inefficient recruitment processes make it difficult to attract qualified candidates, leading to skill mismatches, increased hiring costs, and reduced innovation.</p>		✓		✓		
<p>Talent recruitment, development, and retention – Talent attraction</p> <p>A strong employer brand through effective recruitment attracts top talent and secures a competitive edge, fostering a skilled and motivated workforce.</p>		✓		✓		
<p>Talent recruitment, development, and retention – Training and skills development</p> <p>Lack of training and personal review results in skill stagnation, decreased motivation, and limited career progression, negatively impacting employees' professional and personal growth.</p>		✓			✓	
<p>Talent recruitment, development, and retention – Training and skills development</p> <p>Training and development programmes enhance employees' knowledge, boost confidence, and foster social mobility, leading to a more empowered workforce.</p>		✓			✓	
<p>Talent recruitment, development, and retention – Training and skills development</p> <p>Failure to invest in training decreases productivity, raises turnover rates, and damages 74Software's reputation as an employer that supports growth.</p>		✓				✓
<p>Talent recruitment, development, and retention – Training and skills</p> <p>Strategic investment in training strengthens employee retention, drives innovation, and enhances 74Software's competitiveness in the market.</p>		✓			✓	

2.5.2 Policies related to own workforce (S1-1)

74Software has established comprehensive policies to manage the material impacts, risks, and opportunities related to its workforce, in accordance with ESRS 2 MDR-P. These policies are designed to promote fair working conditions, enhance employee well-being, and support professional development across the Group's entities. By proactively addressing workforce-related risks such as retention, productivity, and compliance, these policies also contribute to the long-term resilience and sustainability of the business.

2.5.2.1 Workforce management policies

Following the acquisition of SBS by Axway in September 2024, 74Software continued to strengthen and align its workforce governance during 2025, notably through the appointment of a Group Chief Human Resources Officer (CHRO) and the launch of a renewed Group-wide HR organisation, supporting a more consistent approach to workforce policies and disclosures across the Group. At this stage, the following policies are applicable to the companies' own workforces worldwide:

- Code of Ethics – Sets Group-wide principles and expected behaviours, including a dedicated “People” chapter covering respect in the workplace, social dialogue, health, safety and well-being, diversity and inclusion, and learning and development, as well as rules related to privacy and the protection of personal data;
- Whistleblowing Procedure – Establishes a confidential mechanism for employees across the Group to report ethical concerns, misconduct, and workplace risks (including discrimination, harassment and other breaches of the Code of Ethics), with safeguards against retaliation and defined follow-up processes.

2.5.2.2 Integration of workforce policies

74Software has established common Group-wide principles through its Code of Ethics, including a dedicated “People” chapter. This chapter sets shared commitments for employees relating to social dialogue and communication (including works councils and dedicated forums such as an annual voice survey), health, safety and well-being (including the promotion of work-life balance and the use of the whistleblowing procedure to support anti-discrimination and anti-harassment commitments), diversity and inclusion (based on respect, equal opportunity and fairness, with attention to reducing gender gaps and supporting underrepresented groups), and learning and development (supporting skills development and career progression through training and development opportunities). These commitments are supported by regular leadership communication and employee feedback mechanisms across the Group.

Building on this common framework, SBS and Axway implement additional policies, practices and guidelines aligned with applicable national labour regulations and local operating requirements. These complement the Group framework and reflect local contexts, including the following examples:

- Social Protection & Working Conditions – National labour laws in all European countries provide comprehensive protections, including minimum wage policies, parental leave, and health benefits;
- Work-Life Balance & Working Time – Work-life balance and working time arrangements are managed in line with local legal frameworks and entity-level policies. For example, SBS has implemented a Right to Disconnect Charter to support healthy working practices and prevent digital overload, while specific policies are in place for shift and standby/callout arrangements for roles requiring non-standard schedules;
- Health & Safety Standards – Compliance with local occupational health and safety regulations ensures a safe working environment in all countries of operation;
- Diversity & Inclusion Commitments – Diversity and equal opportunity commitments are implemented through entity-level frameworks and local requirements, alongside internal procedures to prevent and address discrimination and harassment.

2.5.2.3 Risk and Opportunity management

Workforce-related risks, including job insecurity, long working hours, lack of work-life balance, and inadequate wages, are actively managed through established policies. These risks are monitored and addressed through a combination of Group-wide principles (notably the Code of Ethics and Whistleblowing Procedure), local HR frameworks aligned with national labour laws, and entity-level policies covering working time, well-being, and employee protection mechanisms. In parallel, initiatives focused on training, skills development, and social protection help strengthen talent retention, employee engagement, and employer attractiveness. The Group also pursues opportunities linked to employability and retention through internal mobility and career development initiatives, supported by dedicated learning resources and programmes. Positive results from employee engagement surveys indicate ongoing improvements in job satisfaction and leadership effectiveness. In addition, the Group has strengthened the consistency of employee listening and feedback channels, supporting the identification of emerging workforce priorities and improvement actions. To remain resilient and compliant, the Company continually assesses workforce risks linked to changing work models, regulatory shifts, organisational transformation, and evolving skill demands.

2.5.2.4 Future commitments & continuous improvement

To further enhance alignment with ESRS S1 requirements, 74Software is assessing opportunities to harmonise workforce policies across its portfolio companies over the next three years. Building on the strengthened Group HR governance, 74Software will continue to improve the consistency and transparency of its workforce policy framework and supporting processes across entities, while maintaining alignment with local legal requirements and operating contexts.

2.5.2.5 Human Rights policy commitments and compliance with international standards

74Software is fully committed to upholding and promoting human rights across all its operations and throughout its value chain. This commitment is demonstrated through the Group's participation in the United Nations Global Compact. As an active participant, 74Software supports the Ten Principles covering human rights, labour standards, environmental protection and anti-corruption, and commits to integrating these principles into its strategy, culture and day-to-day operations, as well as to publishing an annual Communication on Progress.

In line with this commitment, 74Software aligns its practices with the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the fundamental conventions of the International Labour Organisation (ILO), which together inform the Group's expectations on labour rights, non-discrimination, respectful working conditions and access to remedy.

74Software's commitment to human rights extends to all employees, partners, and suppliers. Through its Code of Ethics and Supplier & Partner Charter, 74Software sets clear expectations for business ethics, working conditions, health and safety, freedom of association, non-discrimination and environmental responsibility, and requires suppliers and partners to comply with these principles, provide evidence upon request, and accept audit rights.

74Software is committed to upholding the fundamental rights of all employees, ensuring fair working conditions, and preventing adverse human rights impacts. To support this commitment, the Whistleblowing Procedure provides a secure and confidential mechanism for employees to report potential human rights violations, discrimination, or unethical behaviour without fear of retaliation. These policies apply to all employees across the Company's operations and are reinforced by country-specific labour protections, collective agreements, and HR policies tailored to local regulations.

74Software actively engages with employees to monitor and enhance workplace conditions. Employee engagement surveys are conducted across SBS and Axway to assess satisfaction, workplace well-being, and leadership effectiveness. These insights help identify areas for improvement, enabling the Company to take proactive measures to enhance the employee experience. HR teams and the Ethics Committee provide ongoing oversight to ensure compliance with labour rights, maintaining alignment with international human rights standards.

Where adverse human rights impacts are identified, 74Software ensures the provision of effective remedies. The Company's whistleblowing system and grievance mechanisms facilitate the early identification and resolution of workplace concerns. SBS and Axway implement a range of measures to uphold human rights commitments, including initiatives focused on diversity and inclusion, gender pay equity, collective bargaining, and workplace safety. These efforts translate into tangible protections for the workforce. Annual reporting on these commitments, including the Communication on Progress (CoP) of UN Global Compact, is publicly accessible on the UN Global Compact website.

2.5.2.6 Health and safety

74Software prioritises a safe and healthy working environment for all employees across SBS and Axway. While the Company does not have a centralised workplace accident prevention policy, SBS and Axway adhere to country-specific health and safety regulations, ensuring the implementation of workplace accident prevention measures in compliance with local legal requirements. 74Software will report for the first time on the health and safety metrics under ESRS S1-14, strengthening transparency on workforce safety outcomes across the Group.

Ensuring employee health and safety is a core commitment for 74Software. In France, Axway and SBS comply with stringent occupational health and safety regulations, including mandatory risk assessments and employee safety training. The *Document Unique d'Évaluation des Risques Professionnels (DUERP)* is updated annually to identify and assess workplace risks. It is continuously reviewed to reflect changes in working conditions and is shared with employee representatives to ensure transparency and foster collaboration in improving workplace health and safety. This process enables the identification of necessary preventive measures and the implementation of targeted action plans to safeguard employees from potential hazards.

Similarly, in India, SBS and Axway adhere to the Occupational Safety, Health, and Working Conditions Code, ensuring the implementation of preventive safety measures, emergency preparedness, and workplace accident reporting protocols. In Germany, as in France, occupational health doctors conduct regular employee check-ups to support workplace well-being, reinforcing the Company's commitment to maintaining a safe and healthy work environment.

Each entity adheres to national occupational health and safety laws to mitigate risks, prevent workplace accidents, and ensure compliance with local labour standards. In addition to regulatory compliance, workplace well-being and safety are reinforced through local HR policies, employee engagement initiatives, and risk management processes. The implementation of occupational health and safety policies is the responsibility of local HR teams, facility managers, and operational management, with ultimate oversight at the highest level by the Group Chief Human Resources Officer (CHRO), a member of the Executive Committee. In France, employee representation on health, safety and working conditions is organised through the *Commission Santé, Sécurité et Conditions de Travail*, which meets regularly to review workplace conditions, risk assessments (DUERP), prevention programmes, safety training and incident-related topics. In Belgium, similar employee representation mechanisms are in place through the Committee for Prevention and Protection at Work (CPBW/CPPT), in line with national legal requirements.

As part of its continuous improvement efforts, 74Software is exploring ways to further harmonise health and safety policies across all operations to strengthen its accident prevention framework. In this context, 74Software continues to strengthen the consistency and documentation of health and safety practices across entities, while respecting local legal requirements and operational contexts.

2.5.2.7 Commitment to non-discrimination, equal opportunity, and diversity & inclusion

74Software has established Group-wide principles on non-discrimination, equal opportunity and respectful conduct through its Code of Ethics, including the “People” chapter. These commitments are implemented at entity level through local HR frameworks, policies and practices aligned with applicable national

labour laws and operating contexts. Diversity and inclusion are embedded within local HR strategies, ensuring compliance with national labour laws while aligning with corporate commitments to workplace equality. To support these commitments, the Whistleblowing Procedure provides employees with a secure and confidential mechanism to report concerns related to discrimination, harassment or other breaches, with safeguards against retaliation and defined follow-up processes.

Additionally, local policies within SBS and Axway include targeted inclusion measures and positive action initiatives for underrepresented groups. Responsibility for implementing these policies rests with the local HR teams of each entity, under the oversight of the Group Chief Human Resources Officer (CHRO), ensuring alignment with corporate values and commitments to workplace diversity and inclusion.

In France, gender equality is supported through local measures and statutory reporting obligations, including the Gender Equality Index (Egapro). For the 2025 index, the Company reported an overall score of 91/100.

SBS promotes diversity and inclusion through mandatory training, workshops, and mentoring programmes, with initiatives tailored to each country. For example, SBS Belgium has implemented a Diversity Plan that addresses gender, disability, age, nationality, and cultural background. In France, SBS has formalised gender equality commitments through a dedicated collective agreement covering professional equality measures over the 2025–2027 period.

74Software is strengthening its approach to monitoring diversity-related indicators and disclosures. In particular, the Group will report for the first time on the representation of women in management and intends to track this indicator annually going forward. Oversight will be led by the Group Chief Human Resources Officer (CHRO), with regular progress reviews reported to the Executive Committee.

2.5.3 Processes for engaging with own workforce and workers’ representatives about impacts (S1-2)

2.5.3.1 Engagement with employees and workers’ representatives

74Software actively engages with the workforce and workers’ representatives across the Group to ensure that employee perspectives are incorporated into decision-making processes related to actual and potential workplace impacts. While the Company does not have a centralised global framework agreement, its entities adhere to national labour laws and collective bargaining agreements where applicable.

Employee engagement is facilitated through direct communication and structured representation. In countries such as France, Belgium, and Germany, Axway and SBS employees are represented by works councils and employee representatives, who regularly

meet with management to discuss workplace conditions, employment terms, and other concerns. In addition, employee representation mechanisms for health, safety and working conditions are in place where required, including in France and in Belgium.

To gather direct workforce feedback, 74Software runs a Group-wide annual employee engagement survey called “The Voice Survey” to assess workplace well-being, job satisfaction, and inclusion. Insights from these surveys inform policy improvements, work-life balance initiatives, and diversity efforts, reinforcing the Company’s commitment to fostering an inclusive and supportive work environment. The survey is designed to provide both Group-level and entity-level insights and is complemented by team-level discussions and action planning.

In 2026, 74Software launched its first fully harmonised employee engagement survey at Group level, marking a key milestone in aligning employee listening practices across SBS and Axway. The survey was conducted to assess employee satisfaction and engagement during the 2025 reporting period. This single survey approach replaces the previously separate entity-level formats and creates a consistent foundation to monitor employee experience across the Group while still enabling local follow-up in line with country and entity contexts. The survey recorded a strong participation rate of 88%. Results show an overall engagement score of 66%. The results highlight clear strengths in role clarity and alignment with company objectives, as well as open dialogue with managers. These insights are used to inform priorities at both Group and entity level, and are complemented by team-level discussions and action planning to translate feedback into concrete improvements.

74Software central HR teams, in collaboration with local HR teams, are responsible for ensuring the effective implementation of employee engagement processes and integrating employee feedback into decision-making. Where concerns arise, grievance mechanisms such as the whistleblowing system provide employees with a secure and confidential channel to report issues. In addition, employees can raise concerns through local HR channels, and where applicable through employee representatives.

To further strengthen workforce engagement, 74Software is exploring enhanced feedback channels across its entities, ensuring that all employees have a voice in shaping the Company's culture and working environment.

2.5.3.2 Engagement with vulnerable and marginalised employees

74Software is committed to fostering an inclusive workplace where all employees across its entities, including those from vulnerable or marginalised groups, feel heard and valued. To gain deeper insight into the experiences of potentially vulnerable employees, 74Software conducts a Group-wide annual employee engagement survey. This survey assesses job satisfaction, workplace inclusion, and overall well-being, generating valuable insights that inform policies and drive targeted action plans.

Following the creation of 74Software, the Group has harmonised employee listening through a single annual survey approach, enabling more consistent monitoring of employee experience across SBS and Axway while allowing entity-level follow-up in line with local contexts.

Additionally, SBS and Axway comply with country-specific labour protections designed to safeguard the rights of vulnerable employees. In France, statutory gender equality reporting requirements apply, ensuring transparency and promoting equal treatment. In Belgium, SBS adheres to the Diversity Plan, which establishes clear diversity and inclusion requirements to foster equitable workplace practices.

To ensure that all employees have accessible channels to voice their concerns, 74Software has established multiple engagement mechanisms. These include direct interactions with HR business partners and works councils, a whistleblowing system, and personal annual review dialogues. Where applicable, employee representation bodies also support the identification and discussion of workforce-related topics, including health, safety and working conditions. These channels provide employees with safe and confidential ways to raise concerns, suggest improvements, and engage in meaningful discussions with managers, human resources, or the Ethics Committee.

74Software remains committed to monitoring and addressing potential disparities in employee experiences. Insights gained from employee surveys and direct feedback mechanisms enable the Group to identify areas for improvement and implement targeted inclusion initiatives. These efforts include strengthening internal diversity programmes, enhancing leadership training, and expanding mentorship opportunities to ensure that employees from all backgrounds have equitable access to career growth and professional development.

74Software ensures that employees receive clear and accessible information through multiple communication channels tailored to workforce needs. Updates on policies, engagement initiatives, and workplace matters are disseminated via the Company intranet and internal newsletters, ensuring broad accessibility. Additionally, HR business partners and managers play a crucial role in delivering key messages, providing explanations during team meetings and one-on-one discussions. In countries where work councils and employee representatives are in place, these bodies serve as an additional channel for sharing and clarifying important updates for employees covered by collective agreements.

The Company also ensures that grievance mechanisms, including the whistleblowing system, provide employees with a secure and confidential way to report concerns, with clear guidance on the reporting process.

2.5.4 Processes to remediate negative impacts and channels for own workforce to raise concerns (S1-3)

2.5.4.1 Processes for remediating negative impacts and employee grievance channels

74Software is committed to maintaining a fair, ethical, and transparent workplace where employees can safely report concerns and seek remediation for any negative impacts they experience. To uphold this commitment, the Group has established formal grievance mechanisms and confidential reporting channels, enabling employees to raise concerns related to fraud, misconduct, discrimination, harassment, unethical behaviour, or privacy violations without fear of retaliation.

Employees are encouraged to seek assistance if they encounter bias or mistreatment, while managers are required to report any incidents they witness or are informed of. 74Software provides multiple channels for employees to report concerns, ensuring accessibility and confidentiality:

- HR Business Partners – Employees can directly raise concerns with their local HR representatives;
- Whistleblowing System – A dedicated, secured and confidential email reporting system (74software.ethics.notification@74software.com) is accessible to all employees and managed exclusively by the Ethics Committee. This allows employees to anonymously report potential violations related to fraud, corruption, harassment, discrimination, and other ethical concerns;
- Ethics Committee – The Chief Human Resources Officer (CHRO), the VP Legal, and the Head of Internal Audit oversee the whistleblowing system, compliance processes, and employee grievance mechanisms;
- Work Councils and Employee Representatives – In countries where applicable, employees can escalate concerns through formal employee representation structures;
- Data Protection Office – Employees across the companies within the Group have access to an internal ticketing system, enabling them to report any concerns or issues related to data and/or privacy.

All reports submitted through the whistleblowing system are acknowledged within seven working days. The Ethics Committee ensures that employees receive updates on any follow-up actions within three months of the initial report. If an issue is substantiated, corrective measures may include:

- internal investigations and appropriate disciplinary actions in line with 74Software's policies;
- engagement with relevant stakeholders to remediate the impact;
- escalation to legal authorities if required.

74Software ensures that all grievance reports remain confidential, with personal details disclosed only when legally required or with the whistleblower's consent. The Ethics Committee tracks and monitors all reported concerns to ensure timely and effective resolution.

To address data and privacy concerns, the IT Department has established dedicated reporting channels, accessible via the intranet and detailed in employee handbooks and the security policy. Reported issues are tracked through an internal ticketing system, with regular audits and incident reports conducted to maintain oversight. The Data Protection Officer (DPO) and IT support teams oversee investigations, implement corrective actions, and ensure compliance with privacy policies.

Training programmes are conducted to educate employees on data protection laws and privacy policies, fostering awareness and trust in these systems. Measures are in place to safeguard individuals using these channels, ensuring confidentiality and protection against retaliation.

Beyond providing access to grievance mechanisms, 74Software is committed to fostering an environment where employees feel safe, confident, and supported in raising concerns. To reinforce this, the Group promotes open dialogue, with leadership actively engaging with employees, listening to concerns, and integrating feedback into workplace policies.

74Software organises Group-wide leadership communication moments, such as the annual Group Kick-Off, providing employees across SBS and Axway with updates on Group priorities and strategic direction with contributions from members of the Group Executive Committee. Beyond these Group-wide moments, employee engagement is also supported through entity-level meetings and forums. For example, Axway organises regular All Hands meetings led by senior management, providing updates on company performance, strategy and key initiatives, with opportunities for employees to submit questions. SBS organises Executive Catch-Up sessions, providing employees with direct opportunities to receive updates on ongoing initiatives and company priorities and to engage directly with leadership. In addition to the Group Kick-off, Axway and SBS organise annual Kick-Off events to share strategic objectives and reinforce alignment across teams and locations.

As part of its ongoing consolidation efforts, 74Software will continue to evaluate and enhance its grievance mechanisms and follow-up processes to maintain a transparent and accountable work environment. At present, the Company does not have a formal process to assess whether employees are fully aware of and trust the grievance mechanisms available to them. However, 74Software acknowledges the importance of not only providing access to these mechanisms but also ensuring that employees understand and have confidence in using them. Looking ahead, the Group will explore initiatives to further raise awareness, ensuring that all employees are informed about their rights and equipped with the knowledge to utilise grievance mechanisms effectively.

2.5.5 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness (S1-4)

The Impact, Risk, and Opportunity (IRO) indicators described below do not currently have measurable, outcome-oriented targets. 74Software recognises the importance of transparently disclosing the reasons for this. Following Axway's acquisition of SBS in 2024, the harmonisation of policies, data collection processes, and governance structures remains an ongoing process. During 2025, 74Software strengthened its Group-level governance and foundations for harmonisation, including the launch of the Global HR organisation and the issuance of a Group Code of Ethics, while continuing to operate through local policies and processes as integration progresses. Until measurable targets are established, progress will be tracked through qualitative assessments, employee feedback, and existing governance

frameworks, including harmonised employee listening at Group level via The Voice Survey.

74Software remains committed to fostering a secure, fair, and empowering work environment while actively managing workforce-related risks and opportunities. As part of its operational framework, the Company identifies and assesses how its business activities may impact its own workforce through its double materiality analysis. The resulting impacts, risks and opportunities are presented in the IRO tables below, supporting transparency and accountability in workforce management. The following tables present each impact, risk, and opportunity separately under its respective topic.

IROs

Working conditions – Secure Employment

Insecure employment fosters high turnover, team instability, and skill gaps, hindering skill development. It damages the Company's reputation and results in higher costs for retraining, compensating, or recruiting staff.

Risk

Policy

74Software aligns with local labour laws and collective agreements to provide social protection benefits and mitigate job insecurity risks.

In France, Belgium, and Spain, employment regulations ensure that all workers receive fair treatment and protections, while in other regions, social security benefits help reduce financial instability. This applies to all individuals working at 74Software. Responsibility for implementing lies with the local HR teams within each entity, under the leadership of the Heads of HR for Axway and SBS and guided by the strategic oversight of the Group CHRO. In addition, 74Software has implemented Group Internal Transfer Guidelines, defining eligibility criteria and a common process for internal moves to support secure career transitions within the Group.

Programmes

To strengthen job security, 74Software offers internal mobility programmes and career development initiatives, including Pluralsight and University-led training that enhance long-term employability. Internal mobility is supported through internal job postings across Axway and SBS, complemented by regular Group-wide communications highlighting open positions. Workforce stability is monitored through turnover analysis to identify trends and reduce reliance on short-term contracts. Additionally, structured workforce planning and succession strategies help mitigate employment risks and ensure long-term job security.

The effectiveness of these initiatives is assessed through workforce metrics, including turnover rates, employee retention rates, and promotion rates. These indicators are reviewed periodically by HR teams at Axway and SBS to identify trends and adjust workforce planning if necessary. To ensure that 74Software's own employment practices do not cause or contribute to material negative impacts, the Company adheres to national labour laws and collective agreements and engages with employee representatives and works councils, in countries where they are legally mandated or culturally prevalent, such as France, Germany, and Belgium.

IROs**Working conditions – Working time**

Long working hours decrease productivity, increase workplace errors, and lead to higher absenteeism and turnover. Health issues and burnout raise medical costs and harm employee engagement, impacting financial performance.

Risk**Policy**

74Software ensures full compliance with local working time regulations across all its subsidiaries, adapting work schedules in accordance with country-specific labour laws. In certain regions, such as France and Benelux, local HR teams enforce a right-to-disconnect policy, safeguarding employees' rest periods and promoting work-life balance. Additionally, on-call procedures are locally defined by each entity and are accessible through the Company's internal networks, ensuring transparency and clarity for employees. In 2025, SBS India implemented a formal Shift Allowance and Standby/Callout Policy to clarify availability expectations and associated compensation.

Responsibility for implementing these policies lies with the local HR teams within each entity, operating under the leadership of the Heads of HR for Axway and SBS and guided by the strategic oversight of the Group CHRO. This decentralised approach ensures that policies are effectively adapted to local regulations while remaining aligned with the Company's broader commitment to employee well-being and compliance.

Programmes

To support work-life balance, 74Software encourages flexible work arrangements and remote working, ensuring employees have the flexibility to manage their professional and personal commitments effectively. The Company actively monitors employee well-being through surveys assessing workload stress, using the insights gained to enhance workplace policies and promote a healthier work environment.

HR teams at Axway and SBS periodically review key workforce indicators, incorporating employee feedback to identify trends and refine HR policies. 74Software is committed to fostering a workplace where employee well-being is prioritised and continuously evolves its employment practices in response to employee needs and industry best practices.

Beyond compliance with national labour law requirements, 74Software actively engages with employee representatives to identify and mitigate potential risks, implements robust working time policies aligned with collective agreements, and promotes a culture of continuous improvement. Work-life balance initiatives are reviewed annually, with adjustments made based on employee feedback and regulatory developments, ensuring a sustainable and supportive work environment.

IROs**Working conditions – Work life balance**

Poor work-life balance results in decreased productivity, increased staff turnover, and lower job satisfaction. It weakens employee engagement and damages 74Software's long-term financial stability.

Risk**Policy**

74Software actively promotes work-life balance by offering flexible work arrangements, allowing employees, where compatible with their role and local regulations, the option to work entirely remotely or up to 60% of their time remote. Under the Future of Work policy, employees have the freedom to work remotely from a private location for several consecutive days, ensuring greater flexibility in managing their professional and personal commitments.

In France and Benelux, the right-to-disconnect policy ensures that employees can disconnect from work outside of contracted hours, fostering a healthier work-life balance. In other regions, maximum working hour regulations are enforced to prevent overwork and ensure compliance with local labour laws. Additionally, family-related leave policies provide further support for employees in balancing personal and professional responsibilities, reinforcing 74Software's commitment to employee well-being and inclusivity.

This policy applies to all individuals directly employed by 74Software. However, its implementation may vary depending on local labour laws and contractual agreements in different regions.

Responsibility for implementing this policy lies with the local HR teams within each entity, under the leadership of the Heads of HR for Axway and SBS and guided by the strategic oversight of the Group CHRO. This localised approach ensures that the policy is effectively adapted to regional regulations while remaining aligned with the Company's broader commitment to flexibility and employee well-being.

Programmes

Employee well-being is a key priority for 74Software. The Company conducts an annual Group-wide listening survey, called The Voice Survey, covering employees across both brands and geographies. In 2025, 74Software harmonised its employee listening approach into a single survey at Group level. This survey assesses stress levels and work-life balance satisfaction, providing valuable insights that inform initiatives aimed at reducing burnout and enhancing overall well-being.

The effectiveness of these initiatives is measured through survey participation rates and key workforce indicators, including survey results and employee feedback. HR teams at Axway and SBS regularly review this data to identify trends and adjust policies accordingly.

To ensure ethical employment practices, 74Software goes beyond legal compliance, implementing right-to-disconnect policies and actively monitoring workload concerns through ongoing employee feedback mechanisms. Work-life balance policies and initiatives are reviewed annually, with adjustments made based on employee feedback and organisational priorities, ensuring a continuous commitment to employee well-being.

IROs**Working conditions – Adequate wages**

Adequate wages attract and retain skilled employees, fostering motivation and job satisfaction. They enhance the Company's reputation as a responsible employer, ensuring long-term success.

Opportunity**Policy**

74Software is committed to providing fair and competitive wages to all employees, ensuring alignment with relevant legal frameworks and industry benchmarks. In the European Economic Area (EEA), salaries are structured in compliance with Directive (EU) 2022/2041 on adequate minimum wages. Outside the EEA, 74Software references benchmark data from reputable sources, such as the Anker Research Institute, to establish appropriate wage levels in each market.

Annual salary reviews are conducted to ensure wage equity, taking into account market trends, job responsibilities, and individual performance. In France, collective agreements define specific salary equity indicators, which are rigorously applied to maintain fair and transparent pay structures. Through this policy, 74Software aims to support adequate wages and equitable compensation practices across all operations.

This policy applies to all individuals directly employed by 74Software, regardless of location. However, it does not extend to contractors or subcontractors, whose compensation is determined by their respective contractual agreements and applicable local labour regulations.

The implementation and oversight of this policy are managed by local Human Resources (HR) teams within each 74Software entity, operating under the leadership of the Heads of HR for Axway and SBS. The Global Total Rewards COE provides overarching guidance and supports consistency in the policy's application across regions.

Programmes

74Software implements a comprehensive compensation programme designed to ensure fair and competitive remuneration for all employees. This programme includes annual salary increases, ensuring that employee compensation remains aligned with market standards while also reflecting individual performance and contributions. In addition, the Company offers robust career development programmes and training initiatives, enabling employees to enhance their skills and progress into higher-paying roles within the organisation.

The effectiveness of these initiatives is closely monitored through multiple assessment methods. Regular salary benchmarking is conducted against industry standards and competitor compensation data to ensure competitiveness. Internal pay equity analyses are performed to identify and address any disparities, reinforcing fair pay practices. Annual compensation reviews assess performance-based salary adjustments and ensure alignment with market conditions. Employee participation and advancement within career development programmes are actively tracked, along with employee retention rates, particularly in relation to compensation and career progression.

To proactively prevent material negative impacts, 74Software maintains strict compliance with national labour laws and regulations, conducting regular and thorough internal wage equity analyses. The Company ensures adherence to all relevant collective bargaining agreements and implements transparent compensation policies with clear communication practices. Employees have access to confidential mechanisms to report concerns or grievances related to compensation, ensuring they can do so without fear of retaliation.

Salary policies and wage adjustments are reviewed annually, with market benchmarking conducted at least every two years to maintain ongoing competitiveness. Career development programmes and training initiatives are continuously evaluated and updated, ensuring they remain aligned with evolving business needs and employee development goals.

IROs**Open Dialogue – Social dialogue**

Poor social dialogue weakens trust and communication between employees and employers, leading to workplace conflicts, increased tension, and decreased morale.

Impact -**Policy**

74Software is committed to fostering open dialogue and ensuring robust employee representation across its global operations. This commitment is upheld through established mechanisms, including collective bargaining agreements and workers' councils, in countries where they are legally mandated or culturally prevalent, such as France, Germany, and Belgium. These platforms enable meaningful social dialogue, allowing employees to actively participate in decision-making processes concerning working conditions, compensation, and organisational changes.

74Software encourages constructive engagement between management and employee representatives, fostering a culture of transparency, collaboration, and mutual respect. While the policy is primarily focused on formal representation structures, the Company is also committed to promoting open communication and feedback channels across all its global operations, ensuring that employees can express concerns and contribute to workplace discussions, even in regions without formal representation mechanisms. In some countries, such as Romania and Bulgaria, employees may be temporarily appointed as staff representatives to negotiate specific benefits.

This policy applies to all employees in countries where collective bargaining agreements, workers' councils, or other legally recognised forms of employee representation exist. In regions without legal requirements for formal representation, social dialogue is managed through regular management meetings, town halls and other engagement initiatives.

The implementation and maintenance of this policy are managed by local Human Resources (HR) teams within each 74Software entity, under the strategic guidance and oversight of the Group Chief Human Resources Officer (CHRO). The core HR functions in Axway and SBS remain led by the HR leaders in place, who support local implementation in line with national requirements.

Programmes

74Software implements a comprehensive range of employee engagement initiatives designed to foster open dialogue and establish strong communication channels across its global operations. These initiatives are tailored to local contexts and legal requirements, ensuring that employees across different regions have accessible platforms for meaningful engagement.

In countries where legally mandated representation exists, such as France, Germany, and Belgium, collective bargaining agreements and workers' councils serve as primary platforms for social dialogue, facilitating discussions on workplace policies, conditions, and organisational developments. In regions where such representation is not legally required, engagement is ensured through regular employee meetings, regular management meetings, town halls, and other engagement initiatives led by local leaders and HR teams. Afterwork events are typically coordinated by HR, while town halls and engagement sessions are usually led by the management. These initiatives provide employees with direct access to leadership and foster transparency and open communication.

74Software also promotes day-to-day open dialogue and connection through employee recognition initiatives. In 2025, the Group rolled out Kudoboard as a Teams-based recognition platform, enabling employees and managers to share appreciation messages and highlight contributions across teams and geographies. The initiative was launched alongside "Gratitude Month" to reinforce a culture of feedback, recognition and mutual respect, and to strengthen connection and trust as a complement to formal social dialogue mechanisms.

In addition, 74Software uses Group- and entity-wide leadership communications to support open dialogue, including the 74Software Group Kick-off, SBS Executive Catch-Up sessions, and Axway All Hands, which bring employees together across locations through live or streamed formats.

The effectiveness of these engagement initiatives is monitored through multiple indicators, including participation rates in engagement meetings, town halls, and after-work sessions, employee feedback scores from regular surveys, analysis of sentiment and insights gathered through dialogue platforms, tracking of employee concerns and suggestions, and employee retention and satisfaction rates.

To prevent material negative impacts and ensure fair and equitable employee representation, 74Software maintains strict adherence to national labour laws and regulations regarding employee representation and social dialogue. The Company actively promotes inclusive and diverse participation, ensuring that all voices are heard in legally mandated forums. Additionally, confidential feedback mechanisms encourage employees to express concerns openly, without fear of reprisal. Managers receive regular training on effective communication and dialogue practices, equipping them to facilitate productive and transparent discussions with employees.

Social dialogue mechanisms and employee engagement strategies are reviewed annually, with updates made based on employee feedback, evolving regulatory requirements, and best practices in employee relations. The effectiveness of these initiatives is continuously monitored and adjusted to ensure they remain relevant, impactful, and aligned with the needs of employees.

IROs**Open Dialogue – Freedom of association and collective bargaining**

Lack of freedom of association and collective bargaining limits workers' rights, making them vulnerable to unfair treatment. This increases stress, reduces job satisfaction, and negatively affects workplace relations.

Impact -**Policy**

74Software is committed to fostering open dialogue and ensuring robust employee representation across its operations. This commitment is realized through established mechanisms, including collective bargaining agreements and workers' councils, in countries where they are legally mandated or culturally prevalent, such as France, Germany, and Belgium. These platforms facilitate meaningful social dialogue, enabling employees to participate in decision-making processes related to working conditions, compensation, and organizational changes. 74Software actively encourages constructive engagement between management and employee representatives, promoting a culture of transparency and mutual respect. In some countries, such as Romania and Bulgaria, employees may be temporarily appointed as staff representatives to negotiate specific benefits.

This policy applies to all employees directly employed by 74Software. Where legally recognised employee representation mechanisms exist, 74Software supports collective bargaining and structured dialogue through those mechanisms; in other regions, employees are encouraged to use available dialogue channels to raise concerns and contribute to workplace discussions. While the policy focuses on formal mechanisms, 74Software also strives to promote open communication and feedback channels across all its global operations, regardless of formal representation structures.

The implementation and maintenance of this policy are the responsibility of the local Human Resources (HR) teams within each 74Software entity, under the strategic guidance and oversight of the Group Chief Human Resources Officer (CHRO). The core HR functions in Axway and SBS remain led by the HR leaders in place, who support local implementation in line with national requirements.

Programmes

74Software implements a comprehensive range of employee engagement initiatives designed to foster open dialogue and establish strong communication channels across its global operations. These initiatives are tailored to local contexts and legal requirements, ensuring that employees across different regions have accessible platforms for meaningful engagement.

In countries where legally mandated representation exists, such as France, Germany, and Belgium, collective bargaining agreements and workers' councils serve as primary platforms for social dialogue, facilitating discussions on workplace policies, conditions, and organisational developments. In regions where such representation is not legally required, engagement is ensured through regular employee meetings, regular management meetings, town halls, and other engagement initiatives led by local leaders and HR teams. Afterwork events are typically coordinated by HR, while town halls and engagement sessions are usually led by the business. These initiatives provide employees with direct access to leadership and foster transparency and open communication.

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Social dialogue mechanisms and employee engagement strategies are reviewed annually, with updates made based on employee feedback, evolving regulatory requirements, and best practices in employee relations. The effectiveness of these initiatives is continuously monitored and adjusted to ensure they remain relevant, impactful, and aligned with the needs of employees.

IROs**Health and Safety**

Poor health and safety conditions raise injury risks, increase absenteeism, and cause stress-related illnesses, ultimately lowering productivity and employee morale.

Impact -**Policy**

74Software is committed to ensuring a safe and healthy working environment for employees. Occupational health and safety (OHS) is managed through compliance with applicable local regulations and preventive approaches to identify, assess and reduce workplace risks. This supports employee well-being and contributes to organisational continuity and performance.

74Software implements comprehensive health and safety policies that address physical, psychological, and ergonomic well-being, aiming to minimise injury risks, reduce absenteeism, and prevent stress-related illnesses. The Company acknowledges that poor health and safety conditions can significantly impact employee morale and productivity, and therefore prioritises proactive measures to safeguard its workforce. 74Software's OHS approach covers physical risks (e.g. premises safety and emergency preparedness), ergonomic risks (e.g., workstation set-up and screen work) and psychosocial risks (e.g., stress factors), with prevention measures adapted to the local work environment.

This policy applies to all employees directly employed by 74Software, regardless of location or role. While the implementation of specific health and safety measures may vary by country based on local regulations and risk assessments, the core principles of this policy apply universally. 74Software also encourages contractors and subcontractors to adhere to similar health and safety standards within their respective work environments.

The implementation and oversight of this policy area shared responsibility. Local Human Resources (HR) teams, prevention advisors, and Facility Managers within each 74Software entity are responsible for day-to-day implementation and monitoring. The Group Chief Human Resources Officer (CHRO) provides strategic guidance, ensuring consistent application across all entities. The core HR functions in Axway and SBS remain led by the HR leaders in place, who support local implementation in line with national requirements. The Company actively fosters employee participation in health and safety initiatives, encouraging employees to report hazards and contribute to a safe working environment.

Programmes

74Software implements a comprehensive suite of occupational health and safety initiatives to proactively mitigate risks and promote employee well-being across its global operations. These initiatives are tailored to local contexts and legal requirements, ensuring a safe and supportive working environment across all entities.

Axway monitors workplace accidents and absenteeism trends, operating a Health and Safety Committee in France and providing occupational health check-ups in France and Germany. SBS delivers mandatory health and safety training, conducts thorough risk assessments, and provides dedicated support resources for employees in the UK. In France, the Care Programme promotes holistic workplace well-being through structured safety measures and support services. Across all entities, 74Software fosters a culture of prevention through regular safety meetings, hazard reporting systems, and employee participation in health and safety initiatives. In France and Belgium for instance, health and safety processes are developed in collaboration with the Health & Safety Committee (elected employee representatives).

The effectiveness of these initiatives is tracked through local indicators and reviews, including accident reporting, incident follow-up, tracking absenteeism trends, particularly those linked to health and safety concerns, completion of prevention actions, and periodic reviews through local committees and governance mechanisms. Employee participation rates in health and safety training and committee meetings are reviewed, alongside feedback gathered from surveys and reporting mechanisms to address concerns. The effectiveness of risk mitigation measures is assessed through incident investigations and trend analysis.

To proactively prevent material negative impacts, 74Software ensures strict adherence to national and international health and safety regulations, conducts comprehensive risk assessments to identify and mitigate potential hazards, and actively engages with employees through Health and Safety Committees and consultation mechanisms. The Company maintains robust incident reporting and investigation procedures to prevent recurrence, provides personal protective equipment (PPE) and ergonomic assessments where necessary, and implements ongoing training and awareness programmes to promote a culture of safety. Additionally, mental health support programmes are in place to enhance overall employee well-being.

Occupational health and safety initiatives are subject to continuous monitoring and improvement. Regular reviews are conducted, with monthly assessments in some countries through Health and Safety Committees and annual reviews at a global level. In France, the DUERP is subject to regular re-evaluation and it includes a yearly review and prevention programme. Adjustments are made based on regulatory changes, employee feedback, incident investigations, and evolving best practices in occupational health and safety.

IROs**Data Privacy**

Failure to protect employee data privacy results in loss of trust, identity theft risks, and psychological distress, leading to reduced morale and productivity.

Impact -**Policy**

74Software is committed to safeguarding the privacy and security of all employee personal data, recognising the critical importance of data protection in maintaining employee trust and preventing potential risks. The Company enforces strict data privacy policies through its comprehensive Privacy Compliance Programme, ensuring compliance with the General Data Protection Regulation (GDPR), the EU-U.S. Data Privacy Framework, and other relevant international and regional regulations.

This policy establishes clear guidelines for the lawful and transparent collection, storage, processing, transfer, and secure disposal of employee personal data. It also defines employees' rights regarding their data, including access, rectification, erasure, and portability, and provides accessible mechanisms for exercising these rights (including the contact points described in the Privacy Compliance Programme for exercising rights and raising privacy questions). By prioritising data privacy and security, 74Software seeks to prevent data breaches, identity theft risks, and psychological distress, thereby fostering a secure and trustworthy work environment that supports employee morale and productivity.

This policy applies to all employee personal data processed by 74Software across its global operations, regardless of the employee's location or role. While the core principles of data privacy remain consistent, the implementation of specific measures may vary based on regional regulatory requirements and local data protection practices.

74Software has appointed a Group Data Protection Officer (DPO), based in France, who oversees a network of Local DPOs and Local Data Protection Managers across the Group. The implementation and operational oversight of this policy are delegated to the Local DPOs within Axway and SBS, who act under the strategic direction and supervision of the Group DPO. These functions are further supported by the Legal and Compliance teams and by the Group Data Protection Office network, which is responsible for ensuring compliance with applicable data protection regulations and for supporting the deployment of the corresponding policies and procedures throughout the organisation.

The Global Information Security team provides technical expertise and supports the implementation of security measures through the Security Office which supports technical and organisational controls to protect information assets (including personal data). Local HR teams play a crucial role in ensuring employee awareness of data privacy policies and procedures, reinforcing the Company's commitment to a comprehensive and transparent approach to data protection.

Programmes

74Software implements a comprehensive suite of data privacy and security programmes to safeguard employee information and maintain compliance with evolving regulatory requirements. These programmes employ a multi-layered approach, incorporating data encryption, security monitoring, and restricted access protocols across all services in line with the Group's Information Security Policy and Information Security Governance framework.

74Software has established a comprehensive data protection framework that enforces regular risk assessments, Data Protection Impact Assessments (DPIAs), and breach response protocols to mitigate potential risks. 74Software maintains dedicated compliance programmes to ensure adherence to GDPR and other relevant privacy laws, supported by ongoing employee training on data protection best practices.

Across 74Software, continuous efforts are made to enhance data security measures, raise employee awareness through targeted communication campaigns, and provide regular training on data privacy and cybersecurity in response to emerging threats and regulatory developments, including privacy and information security awareness as part of the Group's training expectations.

The effectiveness of these initiatives is measured through the number of reported data breaches and security incidents involving employee data, completion rates and effectiveness of data protection and cybersecurity training programmes, results of DPIAs and vulnerability scans, and employee feedback from surveys and reporting mechanisms regarding data privacy concerns. Additionally, audit results assessing compliance with GDPR and other regulations, as well as the time taken to detect, respond to, and resolve data security incidents, are key indicators of programme success.

To prevent material negative impacts, 74Software enforces strict data encryption, access controls, and security monitoring protocols, conducts regular DPIAs to identify and mitigate privacy risks, and implements robust incident response and breach notification procedures. The Company provides clear and accessible channels for employees to report data privacy concerns, including whistleblowing mechanisms, and ensures ongoing training and awareness programmes on data privacy and security best practices. Regular audits and compliance assessments are conducted, alongside the enforcement of a data minimisation policy to limit the collection and retention of personal data to what is strictly necessary and the availability of privacy contact channels referenced in the Privacy Statement for requests and questions.

Data privacy policies and security initiatives are subject to continuous monitoring and improvement. Regular reviews are conducted, with updates made in response to regulatory changes, emerging cybersecurity threats, and employee feedback. The effectiveness of these programmes is continuously evaluated and adjusted to ensure they remain relevant, effective, and aligned with best practices.

IROs**Data Privacy**

Failing to ensure data privacy for employees can expose 74Software to significant financial risks, including regulatory fines, legal liabilities, increased operational costs for breach management, reputational damage leading to loss of business, and ongoing expenses for cybersecurity and compliance measures.

Risk**Policy**

74Software is committed to protecting personal data and confidential information and to complying with applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR) and the EU-U.S. Data Privacy Framework, as set out in its publicly available Privacy Statement and internal privacy governance framework. The Company defines clear requirements for the lawful collection, use, storage, transfer and retention of personal data, as well as for secure handling of confidential information.

These requirements apply across all 74Software entities and cover employees, temporary workers and, where relevant, External parties acting on behalf of the Group. While implementation may vary according to local regulatory requirements, the core principles of privacy, confidentiality and information security are applied consistently across the organisation.

Oversight of data privacy is supported by the Data Protection Officer function and the Data Protection Office network (including Local Data Protection Managers), which manage compliance with data protection regulations and support the implementation of relevant policies and procedures. Information security governance is supported through the Security Office and the Information Security Management System (ISMS), which define technical and organisational measures to protect information assets, including employee personal data. Local HR teams support awareness and application of privacy requirements within the workforce.

Programmes

To mitigate financial and operational risks linked to data privacy, 74Software implements a combination of privacy governance, information security controls, training and incident management processes.

Key elements include role-based access controls, secure use of IT systems, confidentiality obligations, and awareness activities delivered through privacy and information security training. The Group maintains procedures for identifying, reporting, investigating and remediating personal data breaches and security incidents, coordinated between the Data Protection Office and information security functions where applicable.

Employees have access to dedicated privacy contact channels to exercise their data protection rights or raise privacy-related questions. In addition, suspected non-compliance or data protection concerns can be reported through management, HR, Legal channels or via the Group whistleblowing mechanism, which provides confidentiality and protection against retaliation.

The effectiveness of these measures is monitored through a combination of indicators, including reported privacy and security incidents, completion of awareness training, internal controls and risk assessments, audit activities, and the timeliness and effectiveness of incident response and remediation actions.

To prevent material negative impacts, 74Software applies technical and organisational safeguards, conducts privacy risk management activities (including data protection impact assessments where required), and continuously reviews its privacy and information security frameworks in response to regulatory developments, emerging cyber risks and internal findings. Policies and procedures are periodically updated to ensure ongoing alignment with legal requirements and recognised good practices.

IROs**Diversity and Equal opportunities – Gender diversity**

Gender diversity fosters equal opportunities, reduces gender gaps, and promotes work-life balance, contributing to an inclusive workplace.

Impact +**Policy**

74Software is committed to fostering a workplace culture where gender diversity and equal opportunities are actively promoted and embedded in all aspects of employment. Recognising that gender diversity is essential for innovation, creativity, and organisational success, the Company implements comprehensive initiatives across its entities to ensure fair and equitable treatment for all employees, regardless of gender. This commitment extends beyond compliance with local laws and ethical rules on non-discrimination, as 74Software actively promotes gender equality through initiatives focused on recruitment, promotions, pay equity, leadership development, and work-life balance. The Company applies a strict non-discrimination principle ensuring that candidates and employees are not treated differently based on gender in recruitment, promotions, salary adjustments or access to training opportunities.

As a signatory to the UN Global Compact, 74Software reaffirms its dedication to advancing gender equality and diversity in the workplace. This commitment applies to all employees of 74Software, covering all stages of employment, including recruitment, onboarding, performance management, career development, compensation, and promotions. While the core principles of gender diversity and equal opportunities apply globally, the implementation of specific measures and programmes may vary based on local labour laws, cultural contexts, and the specific needs of each entity.

The implementation and oversight of this policy are a shared responsibility. Local Human Resources (HR) teams, Diversity and Inclusion (D&I) committees or referents, and, in some cases, local CSR referents within each entity are responsible for implementing and monitoring gender diversity initiatives. The Group CHRO provides strategic direction at Group level, while responsibility for implementation sits with local HR teams and the Heads of HR for Axway and SBS, ensuring alignment with Group principles while reflecting local legal and operational contexts.

Programmes

74Software promotes gender diversity through locally anchored programmes and formal commitments, complemented by internal communications and awareness initiatives that support inclusive leadership and equal opportunity.

In France, the 74Software entity also reports the *"Index égalité professionnelle"* (Egapro); for the 2025 declaration, the score reported was 91/100 and the results were published on the Group website. At SBS (France), a formal three-year agreement on professional equality between women and men is in place (signed February 2025), covering key areas such as recruitment practices, access to training, pay equity and career development, and work-life balance measures. This agreement also provides for follow-up indicators and regular review mechanisms to monitor progress over the period. In parallel, SBS runs internal awareness and visibility actions to support women in leadership and technology pathways. As an example, the EmpowHER initiative includes a "Women Shaping SBS" video series highlighting female role models across geographies and functions, designed to inspire and encourage women's career development in tech.

The effectiveness of these initiatives is measured through key diversity metrics, including female representation rates at different job levels, promotion rates of women, gender pay gap analyses, and employee perceptions recorded in engagement surveys. These indicators, along with insights from internal assessments and governance reviews, are regularly presented to the managing entities of Axway and SBS to monitor progress and refine diversity strategies as needed. To ensure that 74Software's gender diversity practices do not cause or contribute to material negative impacts, the Company implements gender pay gap monitoring, provides leadership development programmes to support career progression for women, and upholds the standards outlined in the 74Software Code of Ethics and Whistleblowing Policy, which provide mechanisms for reporting and addressing discrimination or bias.

Gender diversity policies and initiatives are reviewed annually, with progress reported as part of the internal HR reporting framework to maintain transparency, accountability, and continuous improvement in achieving diversity objectives.

IROs**Diversity and Equal opportunities – Diversity**

Workforce diversity improves social inclusion and provides opportunities for underrepresented groups. It reduces discrimination and enhances overall well-being and self-esteem.

Impact +**Policy**

74Software is committed to fostering diversity and inclusion across its workforce, ensuring strict adherence to ethical principles on non-discrimination. This commitment is embedded in the 74Software Code of Ethics, which promotes equal opportunity and fairness and highlights particular attention to reducing gender gaps and supporting underrepresented groups.

The Company implements diversity and inclusion measures through a combination of Group-level principles and locally applicable policies and practices, reflecting the different legal and cultural contexts across the countries where it operates. By embedding diversity and inclusion initiatives into its organisational framework, 74Software promotes a culture of fairness, respect, and equal opportunity, ensuring that all employees, regardless of background, have the support and opportunities needed to thrive.

Governance and responsibilities are shared: the Group CHRO provides overall direction and expectations, while implementation and monitoring sit with local HR teams and the Heads of HR for SBS and Axway, who ensure alignment with Group principles and compliance with local law and practice. Employees also have access to reporting and escalation channels where concerns related to discrimination or unequal treatment arise.

Programmes

Several SBS entities have implemented affirmative action measures at the local level, including mentoring programmes, diversity awareness initiatives, and internal events highlighting female talent.

Similarly, various 74Software entities have introduced targeted initiatives to promote gender diversity and inclusion within their respective regions.

Across the entire 74Software Group, employees receive training and awareness programmes on anti-discrimination, ethics, and diversity, reinforcing the Company's commitment to fair and inclusive workplace practices.

These initiatives ensure that diversity principles are actively promoted and embedded within the organisational culture, supporting equal opportunities and professional development for all employees.

The effectiveness of these initiatives is monitored through relevant indicators, including workforce representation metrics, promotion and pay equity analyses, and employee feedback captured through engagement and listening mechanisms.

IROs
Diversity and Equal opportunities – Measures against violence and harassment

Implementing anti-violence and harassment measures creates a safer work environment, reduces stress, and fosters a culture of respect and dignity, improving employee well-being.

Impact +
Policy

74Software is committed to maintaining a safe, respectful, and inclusive work environment, ensuring that all employees are protected from violence and harassment of any kind.

The Company enforces a zero-tolerance policy against all forms of violence, harassment, and discrimination, including but not limited to physical, verbal, psychological, and sexual harassment. This commitment is reinforced through the 74Software Code of Ethics, which sets expectations for respectful behaviour and prohibits discrimination and harassment. Employees have access to a confidential whistleblowing procedure, which guarantees protection against retaliation for reporting incidents, reinforcing a workplace culture where concerns can be raised safely and without fear of reprisal. Reports can be escalated and handled in line with the Group whistleblowing framework, ensuring confidentiality and non-retaliation.

This policy applies to all employees across 74Software, regardless of location or role, and extends to all work-related settings, including virtual and off-site interactions. While the core principles of this policy apply globally, specific measures and protections may vary by country, depending on national labour laws and legal frameworks.

Responsibility for implementing and enforcing this policy lies with the local HR teams within each entity, operating under the leadership of the CHRO and the Group Legal function, with oversight aligned to the Group's ethics and compliance governance.

These teams are responsible for ensuring that all employees are fully aware of the policy, that incidents are promptly and thoroughly investigated, and that appropriate corrective actions are taken to maintain a safe and respectful workplace for all.

Programmes

74Software implements local-level workplace conduct measures, including the designation of persons of trust in Belgium and the enforcement of a Bullying & Harassment policy in the UK, which includes clear monitoring and escalation protocols for handling reported cases. These initiatives are designed to ensure a safe, respectful, and inclusive work environment across all entities.

The effectiveness of these initiatives is tracked through key indicators, such as the number of reported harassment cases, resolution times, and employee satisfaction with the resolution process. Additionally, employee feedback gathered through regular engagement surveys, as referenced in the "Open Dialogue" section, provides valuable insights into the overall perception of workplace safety and respect. These metrics enable HR teams at Axway and SBS to monitor trends and adjust workplace safety measures as necessary to maintain a secure and respectful working environment.

To ensure that 74Software's workplace conduct practices do not cause or contribute to material negative impacts, the Company adheres to national labour laws, enforces clear reporting and response mechanisms, and provides regular training on prevention and reporting. Investigations into reported incidents are conducted by trained and impartial individuals, ensuring fair and objective outcomes.

Furthermore, the 74Software Ethics Charter and Whistleblowing Policy, as referenced in the "Gender Diversity and Equal Opportunities" section, provide formal mechanisms for reporting and addressing discrimination or bias, while also protecting employees against retaliation.

These anti-violence and harassment policies apply to all employees across 74Software, regardless of location or role, and extend to all work-related settings, including virtual and off-site interactions. These measures are reviewed and updated as needed to reflect regulatory changes, internal feedback, and evolving best practices, ensuring continued alignment with the Group's commitment to workplace safety, dignity and respect.

IROs**Talent acquisition and development– Talent attraction**

Strong talent recruitment and retention strategies support workplace diversity, enhance employee satisfaction, and promote equal opportunities, creating a positive and engaged workforce.

Impact +**Policy**

74Software's approach to talent attraction and recruitment is anchored in its Group Code of Ethics, which sets out commitments to a safe, inclusive and empowering work environment, open communication, diversity and inclusion, and equal opportunity. Building on this framework, the Company implements inclusive recruitment practices designed to attract and retain a diverse and highly skilled workforce. These policies are designed to attract top talent by ensuring fair hiring practices, equal opportunities, and transparency throughout the recruitment process. The Company actively seeks to remove barriers to entry and promotes diversity in candidate pools, recognising that a diverse workforce fosters innovation and drives organisational success. Emphasising its commitment to ethical recruitment and employer branding, 74Software strives to create a positive candidate experience that reflects its values of equity, integrity, and inclusion.

This policy applies to all recruitment activities across 74Software, covering all stages of the hiring process, from sourcing and selection to onboarding. It guarantees fair hiring practices and equal opportunities for all candidates, regardless of gender, ethnicity, age, disability, sexual orientation, religion, or any other protected characteristic. By embedding diversity and inclusion principles into recruitment, 74Software ensures that hiring decisions are based on merit, skills, and potential, reinforcing an equitable and dynamic workplace culture.

Responsibility for implementation lies with local HR teams within each entity, under the overall direction of the Group CHRO and in coordination with the Heads of HR for SBS and Axway. This governance model ensures alignment with Group ethical commitments and consistent principles, while allowing local adaptation to legal and operational contexts. Through continuous monitoring and refinement, 74Software remains dedicated to advancing diversity, equity, and inclusion in its workforce, ensuring a fair and welcoming hiring process for all candidates.

Programmes

74Software provides employees with access to diverse training platforms and comprehensive development programmes, fostering continuous learning and career progression while empowering its workforce. These programmes cover a broad spectrum of topics, including technical skills, leadership development, and diversity and inclusion, and are tailored to meet the specific needs of different departments and roles. By offering customised development opportunities, 74Software ensures that each employee has the resources and support necessary to grow and succeed, enhancing their knowledge, confidence, and career prospects, while also fostering social mobility. To support talent attraction and retention, 74Software strengthens career visibility and internal opportunities across the Group. In 2025, the Group ran the first ever Career Week and related career communications, supporting employees in exploring career paths, engaging in career conversations and accessing development resources. 74Software also promotes internal mobility through its Global Internal Transfer Guidelines, which provide a transparent framework for internal applications across SBS and Axway and encourage employees to apply for internal openings. Internal opportunities are further supported through recurring communications such as "Career Corner" job-posting highlights.

Regular personal reviews are conducted between managers and employees to provide structured feedback, discuss career goals, and identify development opportunities. These interactions reinforce a culture of growth and continuous improvement, ensuring that employees receive targeted guidance and support to advance within the organisation.

The effectiveness of these training initiatives is monitored through training completion rates, employee feedback surveys conducted after each session, and long-term performance assessments. University teams at 74Software analyse these indicators to refine training programmes, ensure alignment with business and workforce development needs, and measure the impact of training on employee performance and career progression. The effectiveness of the attraction and retention levers is assessed through recruitment and retention indicators, internal mobility activity, and employee feedback.

To ensure that 74Software's training and development practices contribute to employee empowerment and social mobility, the Company enforces equal access to learning opportunities, regularly updates training content to reflect evolving business needs and regulatory requirements, integrates employee feedback into programme design, and ensures that personal reviews are conducted in a fair and transparent manner. Through these initiatives, 74Software remains committed to equipping its workforce with the skills, knowledge, and opportunities needed to succeed and advance in their careers.

IROs**Talent acquisition and development– Talent attraction**

Inefficient recruitment processes make it difficult to attract qualified candidates, leading to skill mismatches, increased hiring costs, and reduced innovation.

Risk**Policy**

74Software is committed to ensuring efficient and effective recruitment processes to secure the skills and profiles required to support business performance. Recognising that inefficient recruitment processes can lead to skill mismatches, increased hiring costs, and reduced innovation, the Company emphasises a proactive and data-driven approach to talent acquisition. These policies prioritise equal opportunities, non-discrimination, and the creation of an inclusive work environment, ensuring that 74Software effectively identifies and hires top-tier candidates. The Company aims to streamline recruitment processes, enhance candidate experience, and leverage diverse sourcing strategies to attract qualified individuals from a wide range of backgrounds.

This policy applies to all recruitment activities across 74Software, covering all stages of the candidate journey. While the core principles of non-discrimination and inclusivity remain consistent across all entities, specific recruitment approaches and tools may be tailored based on regional labour markets, legal requirements, and evolving business needs.

Responsibility for the recruitment framework, processes and tool alignment lies with the Global Talent Acquisition Centre of Expertise (COE). Operational implementation is carried by local HR teams within each entity, under the overall direction of the Group CHRO and in coordination with the Heads of HR for SBS and Axway. These teams ensure that recruitment processes are efficient, effective, and aligned with the Company's commitment to diversity and inclusion, and that regular reviews are conducted to optimise recruitment strategies. Through continuous improvement and adaptation, 74Software remains committed to building an innovative, inclusive, and high-performing workforce.

Programmes

74Software implements structured talent acquisition programmes designed to efficiently identify and attract top talent, ensuring alignment with the Company's values and culture. To mitigate the risk of skill mismatches and increased hiring costs, the Company employs diverse recruitment channels, including online job portals, social media, and professional networks, to reach a broad and diverse range of candidates with varied skills and experiences. Additionally, employee referral programmes are leveraged to tap into existing networks, fostering a sense of community and engagement while enhancing recruitment effectiveness.

To reduce dependency on external hiring where relevant and support faster skills matching, 74Software also promotes internal mobility through its Global Internal Transfer Guidelines, which provide a transparent framework for internal applications across SBS and Axway. Internal opportunities are supported through recurring career communications such as "Career Corner", helping increase visibility of open roles and facilitate internal matching of skills to business needs. In 2025, Career Week and related career communications further strengthened employee awareness of internal career paths and opportunities, supporting workforce planning and retention.

The effectiveness of these initiatives is tracked through key recruitment indicators, including workforce demographics, time-to-fill positions, candidate satisfaction surveys, internal mobility activity, and employee feedback on the recruitment experience. These metrics are regularly analysed to assess the efficiency and impact of recruitment strategies, allowing for timely adjustments and continuous improvements.

To mitigate material negative impacts, such as discriminatory hiring practices, skills mismatches, prolonged vacancies and rising recruitment costs, 74Software enforces fair and transparent hiring processes, provides comprehensive training for hiring managers on inclusive recruitment and bias mitigation, and ensures that structured and accessible onboarding programmes are available to all new hires. Recruitment strategies are regularly reviewed and updated based on workforce planning needs, employee feedback, and evolving best practices in talent acquisition, ensuring that the Company remains adaptable, competitive, and committed to fostering an inclusive and dynamic workforce.

IROs**Talent acquisition and development – Talent attraction**

A strong employer brand through effective recruitment attracts top talent and secures a competitive edge, fostering a skilled and motivated workforce.

Opportunity**Policy**

74Software recognises that a strong employer brand is essential for attracting top talent and securing a competitive edge in the marketplace. To capitalise on this opportunity, the Company has established strategic recruitment policies that emphasise its values, culture, and commitment to employee development. These policies are designed to create a positive candidate experience, promote transparency throughout the recruitment process, and position 74Software as an employer of choice. By cultivating a compelling employer brand, the Company aims to attract highly skilled and motivated individuals who align with its vision and contribute to its long-term success.

This policy applies to all recruitment activities across 74Software, ensuring a consistent and authentic representation of the Company's employer brand. While the core principles of employer branding remain uniform across all entities, specific recruitment approaches and messaging may be tailored to align with regional labour markets, legal requirements, and evolving business needs.

Responsibility for employer branding and talent attraction is shared between the Global Talent Acquisition Centre of Expertise (COE), local HR teams within SBS and Axway, and the Marketing and Communications teams, under the overall direction of the Group CHRO. These teams are responsible for ensuring that all recruitment activities reinforce the Company's employer brand, that hiring managers are trained on brand messaging, and that regular reviews are conducted to assess the effectiveness of employer branding strategies. Through continuous evaluation and adaptation, 74Software remains committed to strengthening its reputation as an employer of choice, attracting high-calibre professionals, and fostering a workplace that supports growth, inclusion, and innovation.

Programmes

74Software implements a comprehensive employer branding strategy to attract top talent and secure a competitive edge in the job market. This strategy includes developing compelling career websites, leveraging social media platforms to showcase employee experiences, and creating engaging recruitment content that highlights the Company's values and culture. By utilising diverse recruitment channels, including online job portals, professional networks, and partnerships with educational institutions, 74Software reaches a broad and diverse talent pool, strengthening its reputation as an employer of choice. Additionally, employee referral programmes are leveraged to tap into existing networks, fostering a sense of engagement and advocacy among current employees while promoting the Company as a great place to work.

The effectiveness of these initiatives is tracked through key employer branding and recruitment indicators, including website traffic, social media engagement, candidate satisfaction surveys, and employee feedback on the recruitment experience. These metrics are regularly analysed to assess the strength of the employer brand and the effectiveness of recruitment strategies, ensuring continuous improvement and alignment with talent acquisition objectives.

To ensure that 74Software's employer branding and recruitment practices contribute to a positive and authentic employer image, the Company ensures that all hiring resources align with its values and culture, provides training to hiring managers on brand messaging, and maintains open communication channels with candidates throughout the recruitment process. Recruitment strategies and employer branding initiatives are regularly reviewed and updated based on market trends, candidate feedback, and evolving best practices in talent acquisition and employer branding. Through these efforts, 74Software reinforces its commitment to attracting, engaging, and retaining top-tier talent in a competitive and dynamic job market.

IROs**Talent acquisition and development – Training and skills development**

Lack of training and personal review results in skill stagnation, decreased motivation, and limited career progression, negatively impacting employees' professional and personal growth.

Impact -**Policy**

74Software recognises that continuous learning and skills development are fundamental to employee growth, motivation, and career progression. To mitigate the risks of skill stagnation and limited career opportunities, the Company has established comprehensive training policies that prioritise ongoing employee development. These policies are designed to enhance employees' knowledge, boost their confidence, and foster social mobility, ultimately contributing to a more empowered and adaptable workforce.

74Software's commitments on learning and development are embedded in the Group Code of Ethics, which highlights continuous training and individualised development plans, and recognises the central role of HR in facilitating access to meaningful career growth opportunities.

74Software is committed to providing accessible and relevant training opportunities, including mandatory training, professional development programmes, and role-specific learning, all tailored to meet the evolving needs of both the Company and its employees. The Company also promotes a culture of continuous feedback and personal review, ensuring that employees receive regular guidance and support in their professional development. To assess the quality and relevance of training programmes, user evaluations are collected after each session, offering valuable insights for continuous improvement.

This policy applies to all employees across 74Software, covering all aspects of training and skills development. While the overall principles of continuous learning and upskilling are applied Group-wide, the specific content, delivery methods, and implementation may vary depending on regional regulations, business needs, and job functions.

Responsibility for learning and development is shared across the Group HR organisation: the Global University Centre of Expertise (COE) provides Group-wide learning frameworks and resources, while local HR teams and managers support implementation and ensure that development discussions and learning priorities are embedded in day-to-day people management. Through these initiatives, 74Software remains committed to fostering a culture of lifelong learning, equipping employees with the skills and knowledge needed to succeed in a rapidly evolving industry.

Programmes

74Software provides employees with access to diverse training platforms and comprehensive development programmes, fostering continuous learning and career progression while empowering its workforce. These programmes cover a broad spectrum of topics, including technical skills, leadership development, and diversity and inclusion, and are tailored to meet the specific needs of different departments and roles.

By offering customised development opportunities, 74Software ensures that each employee has the resources and support necessary to grow and succeed, enhancing their knowledge, confidence, and career prospects, while also fostering social mobility.

Regular personal reviews are conducted between managers and employees to provide structured feedback, discuss career goals, and identify development opportunities. These interactions reinforce a culture of growth and continuous improvement, ensuring that employees receive targeted guidance and support to advance within the organisation. To strengthen engagement with learning and career development, 74Software also runs Group-wide initiatives such as Career Week, supporting employees in exploring career paths, engaging in career conversations, and accessing learning resources. Learning and development content and approaches are reviewed and updated based on business needs, employee feedback, and evolving best practices, ensuring that training remains relevant and accessible across the Group. Through these efforts, 74Software supports employees' professional and personal growth and mitigates risks linked to skill stagnation and reduced motivation.

The effectiveness of these initiatives is monitored through key learning and development indicators, including training participation and completion rates, employee feedback and evaluations collected after learning sessions, and longer-term follow-up through performance and development discussions between managers and employees. These indicators are reviewed to assess programme relevance, supporting continuous improvement and alignment with evolving business needs and employee development priorities.

IROs**Talent acquisition and development – Training and skills development**

Training and development programmes enhance employees' knowledge, boost confidence, and foster social mobility, leading to a more empowered workforce.

Impact +**Policy**

74Software recognises that investing in continuous learning and skills development is essential to empowering its workforce and fostering social mobility. This is reflected in the Group Code of Ethics, which highlights continuous training and individualised development plans, and recognises the central role of HR in facilitating access to meaningful career growth opportunities. Building on this framework, 74Software promotes a learning culture that supports personal growth and self-esteem, strengthens employability and contributes to social mobility.

74Software is committed to providing accessible and relevant training opportunities, including mandatory training, professional development programmes, and role-specific learning, tailored to meet the evolving needs of both the Company and its employees. The Company also promotes a culture of continuous feedback and personal review, ensuring that employees receive regular guidance and support in their professional development. User evaluations are collected after each training session, providing valuable insights for continuous improvement. These practices support the Company's aim to reduce inequality in access to development by ensuring that learning opportunities are available across roles and geographies, subject to local context.

This policy applies to all employees across 74Software, covering all aspects of training and skills development. While the overarching principles of continuous learning and upskilling apply Group-wide, the specific content, delivery methods, and implementation may vary based on regional regulations, business needs, and job functions.

Responsibility for learning and development is shared across the Group HR organisation: the Global University Centre of Expertise (COE) provides Group-wide learning frameworks and resources, while local HR teams and managers support implementation and ensure that development discussions and learning priorities are embedded in day-to-day people management. Through these initiatives, 74Software remains dedicated to fostering a culture of lifelong learning, ensuring that employees are equipped to adapt to industry advancements and progress in their careers.

Programmes

74Software provides employees with access to diverse training platforms and comprehensive development programmes that support continuous learning and career progression. These programmes cover a broad range of topics, including technical skills, leadership development, and diversity and inclusion, and are tailored to meet the specific needs of different departments and roles. By offering customised development opportunities, 74Software ensures that each employee has the resources and support needed to grow and succeed. Regular personal reviews are conducted between managers and employees to provide feedback, discuss career goals, and identify development opportunities, fostering a culture of continuous professional development. To strengthen engagement with learning and career development, 74Software also runs Group-wide initiatives such as Career Week, supporting employees in exploring career paths, engaging in career conversations, and accessing learning resources.

The effectiveness of these initiatives is monitored through key learning and development indicators, including training participation and completion rates, employee feedback and evaluations collected after learning sessions, and longer-term follow-up through performance and development discussions between managers and employees. These indicators are reviewed to assess programme relevance and value, supporting continuous improvement and alignment with evolving business needs and employee development priorities.

To ensure that 74Software's training and development practices do not cause or contribute to material negative impacts, the Company enforces equal access to learning opportunities, regularly updates training content to reflect evolving business needs and regulatory requirements, integrates employee feedback into programme design, and ensures that personal reviews are conducted in a fair and transparent manner. Through these proactive measures, 74Software remains committed to empowering employees, fostering career growth, and maintaining a highly skilled and motivated workforce.

IROs**Talent acquisition and development – Training and skills development**

Failure to invest in training decreases productivity, raises turnover rates, and damages 74Software's reputation as an employer that supports growth.

Risk**Policy**

74Software recognises that strategic investment in training and skills development is essential to mitigate the risks associated with decreased productivity, increased turnover rates, and potential damage to its employer reputation. To address these risks, the Company has established comprehensive training policies that prioritise the ongoing development of its employees. These policies are designed to enhance employees' knowledge, boost their confidence, and equip them with the skills necessary to excel in their roles, thereby ensuring high productivity levels and sustained organisational success. These commitments are embedded in the Group Code of Ethics, which highlights continuous training and individualised development plans and recognises the central role of HR in facilitating access to meaningful career growth opportunities.

74Software is committed to providing relevant and accessible training opportunities, including mandatory training, professional development programmes, and role-specific learning, tailored to meet the evolving needs of both the Company and its employees. The Company fosters a culture of continuous feedback and personal review, ensuring that employees receive regular guidance and support for their professional development. User evaluations are collected after each training session, providing valuable feedback for continuous improvement. These practices help mitigate risks linked to skill gaps and reduced motivation by supporting employees' employability and career progression over time.

This policy applies to all employees across 74Software, covering all aspects of training and skills development. While the overarching principles of continuous learning and upskilling apply across the organisation, the specific content, delivery methods, and implementation may vary based on regional regulations, business needs, and job functions.

Responsibility for learning and development is shared across the Group HR organisation: the Global University Centre of Expertise (COE) provides Group-wide learning frameworks and resources, while local HR teams and managers support implementation and ensure that development discussions and learning priorities are embedded in day-to-day people management. These teams ensure that training programmes are effective, accessible, and aligned with employee development goals, and that regular performance reviews are conducted to support employee growth and career progression. Through these initiatives, 74Software remains committed to fostering a culture of continuous learning, empowering employees to adapt to industry advancements, and sustaining a highly skilled and motivated workforce.

Programmes

74Software invests in diverse training platforms and comprehensive development programmes to safeguard productivity, reduce turnover rates, and strengthen its employer reputation. These programmes encompass a broad spectrum of topics, including technical skills, leadership development, and diversity and inclusion, tailored to meet the specific needs of different departments and roles. By offering customised development opportunities, 74Software ensures that each employee has the resources and support required to excel in their roles, thereby enhancing productivity, engagement, and overall job satisfaction. Regular personal reviews between managers and employees provide structured feedback, facilitate career discussions, and identify growth opportunities, all of which contribute to long-term employee retention. To strengthen engagement with learning and career development at Group level, 74Software also runs initiatives such as Career Week, supporting employees in exploring career paths, engaging in career conversations and accessing learning resources.

The effectiveness of these initiatives is monitored through key learning and development indicators, including training participation and completion rates, employee feedback and evaluations collected after learning sessions, longer-term follow-up through performance and development discussions between managers and employees, and workforce indicators such as turnover and internal mobility activity. These indicators are reviewed to assess programme relevance and support continuous improvement, helping to reduce risks linked to productivity loss, skill mismatches and increased turnover. To ensure that 74Software's training and development practices effectively mitigate the risks of decreased productivity and increased turnover, the Company enforces equal access to learning opportunities, regularly updates training content to align with evolving business needs and regulatory requirements, integrates employee feedback into programme design, and ensures that personal reviews are conducted in a fair and transparent manner. Through these initiatives, 74Software strengthens employability and career progression, helping to maintain a skilled, engaged and future-ready workforce while reducing recruitment and retraining costs linked to avoidable turnover.

IROs**Talent acquisition and development – Training and skills**

Strategic investment in training strengthens employee retention, drives innovation, and enhances 74Software's competitiveness in the market.

Opportunity**Policy**

74Software recognises that strategic investment in training and skills development is a key driver of employee retention, innovation, and market competitiveness. To capitalise on this opportunity, the Company has established comprehensive training policies designed to empower employees with the knowledge and skills necessary to excel in their roles and contribute to the Company's success. These policies foster a culture of continuous learning and innovation, encouraging employees to acquire new skills, explore emerging technologies, and drive organisational growth. These commitments are embedded in the Group Code of Ethics, which highlights continuous training and individualised development plans and recognises the central role of HR in facilitating access to meaningful career growth opportunities.

74Software is committed to providing relevant and accessible training opportunities, including mandatory training, professional development programmes, and role-specific learning, all tailored to meet the evolving needs of both the Company and its employees. The Company also promotes a culture of continuous feedback and personal review, ensuring that employees receive regular guidance and support for their professional development. User evaluations are collected after each training session, providing valuable insights for continuous improvement.

This policy applies to all employees across 74Software, encompassing all aspects of training and skills development. While the core principles of continuous learning and upskilling apply across the Group, the specific content, delivery methods, and implementation may vary based on regional regulations, business needs, and job functions.

Responsibility for learning and development is shared across the Group HR organisation: the Global University Centre of Expertise (COE) provides Group-wide learning frameworks and resources, while local HR teams and managers support implementation and ensure that development discussions and learning priorities are embedded in day-to-day people management. These teams ensure that training programmes are effective, accessible, and aligned with employee development goals, and that regular performance reviews are conducted to support employee growth and career progression. Through these initiatives, 74Software remains committed to developing a highly skilled, adaptable, and innovative workforce, ensuring long-term success and sustained competitive advantage.

Programmes

74Software invests in diverse training platforms and comprehensive development programmes to strengthen employee retention, drive innovation, and enhance its market competitiveness. These programmes cover a broad spectrum of topics, including technical skills, leadership development, and diversity and inclusion, tailored to meet the specific needs of different departments and roles. By offering customised development opportunities, 74Software ensures that each employee has the resources and support required to excel in their roles, thereby fostering innovation and increasing employee engagement. Regular personal reviews between managers and employees provide structured feedback, facilitate career discussions, and identify growth opportunities, all of which contribute to long-term employee retention and organisational success. To strengthen engagement with learning and career development at Group level, 74Software also runs initiatives such as Career Week, supporting employees in exploring career paths, engaging in career conversations and accessing learning resources.

The effectiveness of these initiatives is tracked through key learning and development indicators, including training participation and completion rates, employee feedback and evaluations collected after learning sessions, and longer-term follow-up through performance and development discussions between managers and employees. Broader workforce indicators such as retention and internal mobility activity are also reviewed to assess whether development opportunities support long-term employability and engagement.

To ensure that 74Software's training and development practices actively contribute to employee retention, innovation, and market competitiveness, the Company enforces equal access to learning opportunities, regularly updates training content to align with evolving business needs and regulatory requirements, integrates employee feedback into programme design, and ensures that personal reviews are conducted in a fair and transparent manner. Through these initiatives, 74Software remains committed to fostering a culture of continuous learning, professional growth, and innovation, ensuring a highly skilled, engaged, and future-ready workforce.

2.5.6 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities of those actions (S1-5)

Following Axway's acquisition of SBS in 2024, a structured process was initiated to harmonise and unify methods for monitoring negative impacts, advancing positive impacts, and managing risks. While both companies retain a degree of independence, the Group is developing a roadmap to establish common processes and governance to progressively align workforce practices and disclosures across 74Software. This work accelerated during 2025 with the appointment of a Group Chief Human Resources Officer (CHRO) and the launch of a renewed Group-wide HR organisation, supporting the development of more consistent approaches across entities.

At 74Software, the core values inherited from Sopra Steria – sustainability, a human-centred approach, and a strong sense of purpose – continue to shape the Company's culture. This commitment is reflected in efforts to foster a diverse and inclusive workplace where all employees feel valued, respected, and empowered. Employee well-being is a priority, supported by opportunities for professional growth and development. By promoting open communication, collaboration, and a culture of continuous learning, the Company enables employees to contribute their unique skills and perspectives, driving innovation and inclusivity. This human-centred approach ensures that 74Software's values extend beyond its products and services to its workforce, creating a positive and fulfilling work environment for all.

Both Axway and SBS have a long-standing commitment to investing in talent development. Through their respective corporate universities, both companies provide comprehensive training programmes throughout the year to enhance employee skills and digital proficiency. In terms of diversity and inclusion, Axway and SBS demonstrate strong alignment in their practices, fostering open dialogue, promoting health and safety, and prioritising data privacy. These shared values have contributed to a smoother integration process.

In 2025, 74Software further strengthened common frameworks supporting employability and career development, including the rollout of Group Internal Transfer Guidelines and dedicated career development communication initiatives.

As of the reporting period, 74Software has not yet defined a harmonised set of Group-wide quantitative targets under ESRS S1-5. Target setting and monitoring are therefore primarily managed at entity level, in line with applicable legal requirements, collective agreements and local HR frameworks. The Group's priority is to progressively harmonise approaches and strengthen the consistency of workforce governance, evidence and disclosures across SBS and Axway through the HR Chapter.

A significant focus area at SBS was gender equality. A collective agreement in France, incorporating specific salary equity indicators, provided a framework for addressing pay disparities. Furthermore, the HR, CSR, and University teams collaborated on a dedicated feminisation programme, overseen by the CEO of SBS. This initiative aimed to increase female representation in management roles through targeted recruitment and development efforts.

Going forward, 74Software intends to further structure its approach to target setting for material workforce topics, leveraging Group-wide employee listening via the annual engagement survey, social dialogue mechanisms, and HR governance to define priorities, monitor progress and support continuous improvement across entities. Through structured governance, robust feedback mechanisms, and strategic initiatives, 74Software will collaborate to create a thriving and sustainable work environment where all employees can reach their full potential.

2.5.7 Characteristics of the undertaking's employees (S1-6)

Gender	Number of employees 2024	Number of employees 2025
Male	3,358	3,184
Female	1,429	1,384
Other	–	–
Not declared	–	3
TOTAL EMPLOYEES	4,787	4,571

Country	Number of employees 2024	Number of employees 2025
Australia	19	17
Belgium	263	212
Brazil	25	23
Bulgaria	152	164
Cameroon	48	47
France	1,505	1,481
Germany	68	68
Hong Kong	3	3
India	843	785
Ireland	59	61
Italy	10	10
Ivory Coast	27	22
Lebanon	120	117
Luxembourg	79	75
Morocco	166	181
Netherlands	25	15
Romania	269	272
Senegal	9	6
Singapore	17	17
Spain	143	130
Sweden	3	3
Switzerland	3	6
Tunisia	36	25
United Arab Emirates	31	24
United Kingdom	511	468
United States	353	337
TOTAL	4,787	4,571

Employees by contract type, broken down by gender

	Female	Male	Other	Not declared	Total 2024
Number of employees (head count)	1,429	3,358	–	–	4,787
Number of permanent employees (head count)	1,419	3,315	–	–	4,734
Number of temporary employees (head count)	10	43	–	–	53
Number of non-guaranteed hours employees (head count)	–	–	–	–	–

Employees by contract type, broken down by gender

	Female	Male	Other	Not declared	Total 2025
Number of employees (head count)	1,384	3,184	–	3	4,571
Number of permanent employees (head count)	1,371	3,138	–	3	4,512
Number of temporary employees (head count)	13	46	–	–	59
Number of non-guaranteed hours employees (head count)	–	–	–	–	–

Employees by contract type, broken down by region (head count)

	Americas	Asia – Pacific	Europe	Middle East – Africa	Total 2024
Number of employees (headcount)	378	882	3,090	437	4,787
Number of permanent employees (head count)	378	879	3,040	437	4,734
Number of temporary employees (head count)	–	3	50	–	53
Number of non-guaranteed hours employees (head count)	–	–	–	–	–

Employees by contract type, broken down by region (head count)

	Americas	Asia – Pacific	Europe	Middle East – Africa	Total 2025
Number of employees (headcount)	360	824	2,962	422	4,571
Number of permanent employees (head count)	360	817	2,913	422	4,512
Number of temporary employees (head count)	–	7	52	–	59
Number of non-guaranteed hours employees (head count)	–	–	–	–	–

Average number of employees during the reporting period

	Jan.	Feb.	March	April	May	June	July	August	Sept.	Oct.	Nov.	Dec.
2024	1,469	1,459	1,457	1,463	1,467	1,471	1,467	1,462	4,908	4,869	4,847	4,787
2025	4,538	4,550	4,577	4,592	4,607	4,635	4,615	4,594	4,623	4,631	4,602	4,571

2.5.7.1 Employee turnover and methodologies

In 2025, changes in headcount and workforce movements reflected the continued integration of SBS and Axway within 74Software and the progressive alignment of the Group operating model. During the reporting period, 409 employees departed from SBS and Axway, resulting in an overall employee turnover rate of 8.9%. Turnover was driven by these transformation initiatives supporting the implementation of 74Software's Group strategy.

Turnover data has been calculated using the Headcount Method, which accounts for the total number of individual employees, irrespective of their working hours. Full-Time Equivalent (FTE) calculations were not applied, ensuring that all figures are based strictly on headcount, and is defined as the number of employee leavers during the reporting period divided by average headcount over the same period.

2.5.8 Characteristics of non-employees in the undertaking's own workforce (S1-7)

In 2025, 74Software engaged non-employees (contractors) to support its operations across SBS and Axway. Contractors are used to complement internal capacity and skills based on operational needs and delivery requirements.

These resources are primarily used in two main areas: some contractors are directly involved in operational, revenue-generating activities across Professional Services, R&D, SaaS & Cloud Support, and Engineering. These contractors contribute directly to revenue by working on client-facing projects and are

re-invoiced to customers. In contrast, other contractors support indirect, internal functions, including business unit management, sales, administrative, and functional roles. While they do not generate revenue directly, they support operational continuity and internal capacity.

74Software's strategic use of non-employees in both productive and structural roles reflects its ability to flexibly support revenue-generating operations while sustaining long-term strategic initiatives.

Numbers of non-employees (headcount)	2024	2025
Contractors	594	671

2.5.9 Collective bargaining coverage and social dialogue (S1-8)

At 74Software, we are committed to fostering fair and transparent working conditions for all employees. Collective bargaining agreements cover 46% of our workforce, ensuring structured representation and negotiated employment terms.

Within the European Economic Area (EEA), collective bargaining agreements are in place across several countries, covering 40% of employees. Outside the EEA, 6% of employees benefit from similar agreements.

For employees not covered by collective bargaining agreements, working conditions and employment terms are determined by local laws or industry-specific collective agreements, ensuring compliance with national labour standards.

Social dialogue remains a key focus, with 40% of employees globally represented by workers' representatives. Specific representation rates vary across EEA countries where 74Software has a significant presence. The company does not currently have an agreement for employee representation through a European Works Council (EWC), a Societas Europaea (SE) Works Council, or a Societas Cooperativa Europaea (SCE) Works Council.

74Software	Collective bargaining coverage		Social dialogue
Coverage rate	Employees – EEA	Employees – Non-EEA	Workplace representation
0-19%	Bulgaria, Ireland, Italy, Luxembourg, Netherlands, Romania, Sweden, Switzerland, Germany	Australia, Brazil, Hong Kong, India, Lebanon, Singapore, United Arab Emirates, United Kingdom, United States	Australia, Brazil, Bulgaria, Cameroon, Hong Kong, India, Ireland, Italy, Ivory Coast, Lebanon, Morocco, Netherlands, Romania, Senegal, Singapore, Spain, Sweden, Switzerland, Tunisia, United Arab Emirates, United Kingdom, United States
20-39%			
40-59%			
50-79%			
80-100%	Belgium, France, Spain	Tunisia, Ivory Coast, Senegal, Cameroon, Morocco	Belgium, Luxembourg, France, Germany

2.5.10 Diversity metrics (S1-9)

Data Point	2024	2024 %	2025	2025 %
ExCom – Gender with lowest representation (female)	0	0	1	11%
All employees – Gender with lowest representation (female)	1,429	30%	1,384	30%

74Software has reported gender distribution at the top management level, using the Executive Committee (ExCom) as the reference point. This approach aligns with the Company's internal governance structure, as ExCom members serve as the highest operational decision-makers, directly shaping strategic direction and corporate policies.

Age Group	2024	2024 %	2025	2025 %
Under 30 years old	786	16%	669	15%
30-50 years old	3,035	63%	2,913	64%
Over 50 years old	966	20%	986	21%
TOTAL	4,787	100%	4,568	100%

2.5.11 Adequate wages (S1-10)

74Software ensures that all employees receive fair and adequate compensation in accordance with national and international benchmarks.

Within the European Economic Area (EEA), employee wages comply with Directive (EU) 2022/2041 on adequate minimum wages and align with the Anker Research Institute's living wage data. The Company guarantees that wages meet or exceed the national minimum wage in every EEA country where it operates.

For employees in non-EEA countries, 74Software relies on external benchmarks, including the Anker Research Institute's living wage data, to assess wage adequacy. Where Anker living wage benchmarks are not available for a given country, 74Software uses WageIndicator benchmarks as a supplementary source. In all non-EEA locations, wages are above or aligned with both the applicable national minimum wage and the living wage standards set by the selected benchmark source.

2.5.12 Social protection (S1-11)

74Software provides social protection for employees across its countries of operation through a combination of public programmes and employer-provided benefits, depending on local legislation and employment practices. These protections are designed to safeguard employees against loss of income linked to major life events, including sickness, unemployment, employment injury or ill-health, parental leave and retirement. Across the Group, employees are covered for sickness through statutory schemes and/or company benefits, with employer benefits used where appropriate to complement public coverage, particularly when statutory coverage is limited.

Regarding unemployment protection, coverage varies depending on the national framework. Employees are not covered by a mandatory public unemployment protection scheme in Singapore, Tunisia, Ivory Coast, Senegal, Cameroon and Lebanon, as these labour systems do not provide state-funded unemployment benefits.

As a result, employees in these countries rely on end-of-service gratuity payments and personal savings in case of job loss. In the United Arab Emirates (UAE), a mandatory unemployment insurance scheme exists; however, enrolment and contributions are the individual responsibility of employees rather than the employer, as the scheme operates as a private insurance system mandated by the government. Regarding retirement, specific limitations were identified in Lebanon and in the United Arab Emirates for expatriate employees due to the absence of a state pension system for expatriate workers. In the United States, retirement coverage includes Federal Social Security programmes and an optional company retirement plan, where employees may choose to participate. Parental leave coverage is provided across the Group, with full coverage identified, except that no paid paternity leave was identified in Lebanon.

2.5.13 Training and skills development metrics (S1-13)

Talent review	SBS 2024	Axway 2024	SBS 2025	Axway 2025
Talent review Overall participation rate of men (%)	51%	99%	100%	98%*
Talent review Overall participation rate of women (%)	54%	99%	100%	97%*

* The participation rate is calculated based on the agreed number of employees scheduled for a Talent Review in 2025. This agreed number excludes employees who were not planned for a Talent Review due to specific circumstances, such as recent hires, employees approaching retirement, or other predefined exceptions. Therefore, the participation rate reflects the proportion of employees who completed the Talent Review out of those who were required to undergo the process in 2025.

Training	2024	2025
Overall amount of training hours	N/A	50,285
Average number of training hours per employee	N/A	11
Average number of training hours per male employee	N/A	11.2
Average number of training hours per female employee	N/A	10.7
Number of managers undergone non-discrimination training	N/A	22
Number of non-managers undergone non-discrimination training	N/A	215

In 2025, 74Software maintained its global approach to continuous performance management, built on the Conversation/Feedback/Recognition system. This approach fosters ongoing dialogue and regular feedback between managers and employees throughout the year. Employees are encouraged to seek feedback on their work throughout the year and to engage in career follow-up discussions to support professional development.

Axway conducts a global talent review covering the entire workforce to evaluate employee performance and potential. This annual, collaborative exercise is jointly managed by managers and Human Resources, ensuring a structured assessment of key talent and the identification of development and training initiatives essential for individual growth. These reviews also assess training needs, job matrix positioning, internal mobility aspirations, and overall potential within the Company.

SBS has adopted a similar framework for monitoring and developing its permanent employees, structured around two key roles: the operational manager and the mentor. The operational manager is responsible for defining objectives, launching performance reviews, and ensuring effective employee monitoring. This role extends to career development, supporting employees in identifying growth opportunities and achieving their professional

goals. In addition to the operational manager, SBS employees have the option to select a mentor to provide additional career guidance aligned with their long-term aspirations. Mentors play a key role in launching and shaping development plans, offering tailored support to enhance professional growth. Key performance indicators, including the definition and achievement of objectives, are actively tracked by operational managers to measure progress and ensure alignment with the Company's broader strategic goals. This dual-role system underscores SBS's commitment to fostering a culture of continuous professional development, empowering employees to reach their full potential.

In 2025, 74Software initiated the progressive harmonisation of HR practices across SBS and Axway through the launch of a renewed Group-wide HR organisation structured around Centres of Expertise (COEs). This model supports the alignment of talent, learning and development approaches across the Group, while maintaining continuity of local HR support within SBS and Axway. As part of this evolution, 74Software strengthened its Talent & Development governance through the appointment of a Global Leader for Talent & Development, supporting the review and alignment of talent and development processes across entities.

2.5.14 Health and safety metrics (S1-14)

74Software provides a safe and healthy working environment for all employees across SBS and Axway. Health and safety responsibilities are implemented at entity and country level in line with applicable legal requirements, supported by local prevention measures and processes relevant to office-based working environments. In 2025, the Group continued consolidating health and safety reporting across entities to strengthen consistency and enable Group-level disclosure under ESRS S1-14. 74Software considers the structured monitoring of workplace health and safety outcomes essential to prevention and continuous improvement.

100% of 74Software employees are covered by a health and safety management system. This coverage reflects the current maturity of entity-level systems and reporting frameworks

across the Group and will continue to be strengthened as reporting processes further align.

In 2025, 74Software recorded zero fatalities in its own workforce resulting from work-related injuries and zero fatalities resulting from work-related ill health. The Group also recorded 14 recordable work-related accidents, corresponding to a rate of 1.5. Recordable work-related ill health cases amounted to two in 2025.

In total, 304 days were lost due to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health. These indicators support the Group's ongoing efforts to monitor workplace health and safety outcomes and identify areas for continued improvement.

Data Point	2024	2025
Percentage of people in its own workforce who are covered by the undertaking's health and safety management system	N/A	100%
Number of fatalities in own workforce as result of work-related injuries and work-related ill health	N/A	0
Number of fatalities as result of work-related injuries and work-related ill health of other workers working on undertaking's sites	N/A	0
Number of recordable work-related accidents	N/A	14
Rate of recordable work-related accidents	N/A	1.5
Number of cases of recordable work-related ill health	N/A	2
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health	N/A	304

2.5.15 Work-life balance metrics (S1-15)

74Software is committed to fostering work-life balance by ensuring that employees have access to family-related leave, including maternity, paternity, parental, and carers' leave. The Company upholds equitable access to these benefits across its workforce, aligning with local legal requirements in each operating country.

In 2025, SBS provided family-related leave to 97% of employees. Among those eligible, 13.5% of employees took family-related leave during the reporting period (male: 10.4%; female: 3.1%). In 2025, Axway provided family-related leave to 100% of

employees. Among those eligible, 8.8% of employees took family-related leave during the reporting period (male: 6.9%; female: 1.9%).

All 74Software employees are granted family-related leave in compliance with applicable national social policies and labour regulations. Where relevant, collective bargaining agreements further reinforce these entitlements, ensuring that employees across all SBS and Axway locations have access to maternity, paternity, parental, and carers' leave.

2.5.16 Remuneration metrics (pay gap and total remuneration) (S1-16)

2.5.16.1 Gender pay gap

74Software is committed to fair and equitable compensation practices across all operating countries. While the Company upholds the principle of equal pay for equal work, the calculation and reporting of a gender pay gap requires consistent underlying remuneration data and a standardised methodology across entities and countries.

In 2025, the calculation and reporting of the gender pay gap took place in a context of ongoing transformation of the Group's HR information systems and organisational perimeter, notably following the acquisition of SBS and the progressive implementation of Workday as a global HR information system. As a result, remuneration data remains heterogeneous across entities and countries, and not all data elements required for a fully CSRD-aligned gender pay gap calculation (such as actual gross hourly remuneration or certain local payroll components) are yet consistently available at Group level, in particular for recently integrated SBS populations.

In this context, 74Software reports a gender pay gap indicator for the 2025 reporting period based on the best available and most comparable remuneration data currently accessible within the Group, primarily target compensation data (base salary and target bonus), calculated as the percentage difference between the average target total cash compensation of men and women, expressed on a full-time equivalent basis. This approach represents an improvement compared to 2024, as it reflects increased data consolidation and transparency at Group level. The reported gender pay gap for the 2025 reporting period is 23%.

However, 74Software recognises the importance of transparency in pay equity and is actively working towards harmonising remuneration data, notably through the continued deployment of Workday and the progressive integration of SBS data into

centralised HR systems. These efforts are intended to facilitate a more standardised, accurate and representative gender pay gap reporting approach in future reporting periods, with the objective of progressively aligning gender pay gap reporting with CSRD requirements.

2.5.16.2 Annual total remuneration ratio

74Software has calculated the annual total remuneration ratio, which compares the earnings of the highest-paid individual to the median annual total remuneration of all employees, excluding the highest-paid individual. This calculation was based on fixed annual compensation and theoretical variable compensation for all employees contractually present as of 31 December 2025.

To ensure accuracy and comparability, remuneration figures have been restated to a full-time and full-year equivalent basis. The methodology applied is the one historically used by the Company. It does not take into account the fair value of the shares. 74Software will continue strengthening alignment with the CSRD definition for future reporting periods.

Based on this calculation, the remuneration ratio is:

- 20.7:1 for the CEO of 74Software;
- 13.4:1 for the Deputy CEO (also CEO of SBS).

These figures reflect structural and regional variations across the Company's international operations, where salary levels are influenced by local market conditions, job functions, and economic factors.

Moving forward, 74Software remains committed to responsible remuneration practices, ensuring that compensation structures remain competitive, transparent, and aligned with both business objectives and industry benchmarks.

2.5.17 Incidents, complaints and severe human rights impacts (S1-17)

74Software is committed to maintaining a respectful and inclusive workplace where discrimination, harassment and other human rights-related concerns are addressed promptly and consistently. During the reporting period, the Group continued to strengthen its approach to identifying and handling such incidents across SBS and Axway, building on the governance and reporting channels set out in the Group Code of Ethics and the Whistleblowing Procedure.

Employees can raise concerns through several internal channels, including local HR teams and, where applicable, employee representation bodies. In addition, the Group provides a dedicated confidential reporting channel managed by the Ethics Committee, which can be used to report concerns such as discrimination, harassment or other ethical issues. Reports are treated confidentially and are handled in line with the Group procedure, including acknowledgement of receipt within seven working days and follow-up communication within three months, subject to the circumstances of the case and applicable confidentiality requirements.

Data Point	2024	2025
Number of severe human rights issues and incidents	N/A	0
Amount of fines, penalties, and compensation for severe human rights issues and incidents	N/A	0
Number of incidents of discrimination	N/A	0
Number of complaints filed through channels for people in own workforce to raise concerns	N/A	2
Number of complaints filed to National Contact Points for OECD Multinational Enterprises	N/A	0
Amount of fines, penalties, and compensation for damages as result of incidents of discrimination, including harassment and complaints filed	N/A	USD 24,532.60

In the reporting period, 74Software did not identify any severe human rights incidents connected to its own workforce.

The figures reported are primarily compiled from cases reviewed by the Ethics Committee, based on inputs from the Group whistleblowing channel and escalations from HR and other internal functions.

2.6 Consumers and End-Users (ESRS S4)

2.6.1 Consumers and end-users IROs (S4)

74Software's approach to consumers and end-users is designed to build trust, ensure long-term service reliability, and support inclusive access to digital solutions across its value chain. The Group recognises that secure, accessible and user-centred software is essential for protecting end-users, maintaining customer confidence and sustaining long-term business relationships.

By prioritising data and transaction security, customer experience, financial inclusion and digital accessibility, 74Software seeks to maximise positive impacts while mitigating risks related to

service continuity, data protection and accessibility compliance. This approach supports the reliability of the Group's solutions in sensitive environments such as financial services, healthcare and public sector use cases.

74Software's commitment to responsible digital practices underpins its role as a trusted technology partner, enabling customers and their end-users to rely on secure, transparent and inclusive digital services. This commitment extends beyond the Group's own operations and is embedded throughout its relationships with customers, partners and other relevant stakeholders.

IROs		Value Chain Location			Time Horizon		
		Upstream	Own operations	Downstream	Short term	Medium term	Long term
Data transaction and security	Potential negative impacts on customers or end-users due to cyberattack on 74S:						
	<ul style="list-style-type: none"> ■ leakage of strategic or personal data; ■ ransomware and phishing attacks; ■ limited access to information or services. 			✓	✓	✓	✓
Data transaction and security	Reputational, legal and economic risk due to cyber-attacks (business loss due to shut down, loss of contracts, legal expenses, ransomware attacks).		✓			✓	✓
Data transaction and security	If a cyberattack is successful, it could result in loss of access to critical IT tools and significant financial losses due to operational downtime.		✓	✓	✓	✓	✓
Customer Experience	Economic, reputational, and legal risks arising from poor client relationships or inadequate consideration of clients (as end-users), potentially resulting in business impacts such as dissatisfaction or contract loss.		✓			✓	✓
Customer Experience	Business opportunities driven by a strong reputation, client appeal, and loyalty, resulting from positive relationships and attentive consideration of clients (as end-users).		✓			✓	✓
Financial Inclusion	Extending banking services to underserved populations, including low-income individuals and small businesses in Africa, by providing basic services such as deposit and withdrawal facilities.			✓	✓	✓	✓
Financial inclusion	Enhancing local economies and improving the quality of life for local populations.		✓	✓	✓	✓	✓
Digital accessibility	Digital accessibility is subject to a strengthening regulatory landscape, which requires adapting to new rules and standards to avoid any legal issues.		✓	✓	✓	✓	✓

2.6.2 Policies related to consumers and end-users (S4-1)

The Company's approach to consumers and end-users is guided by its Code of Ethics, which sets out expectations for responsible business conduct, integrity in business practices, protection of personal data and information security, and the ethical use of technologies in interactions with customers, partners and other external stakeholders. The Code of Ethics applies across all entities of the Company, including Axway and SBS, and covers both the Company's own operations and its business relationships.

The Code of Ethics defines mechanisms to report and address non-compliant behaviour. These mechanisms include a whistleblowing procedure that is accessible to employees and external stakeholders, enabling the reporting of concerns related to breaches of ethical principles, legal requirements or fundamental rights.

More detailed policies and programmes addressing specific material impacts, risks and opportunities related to consumers and end-users are described below for each material topic.

IROs

Data transaction and security

Potential negative impacts on customers or end-users due to cyberattack on 74Software, leakage of strategic or personal data; ransomware and phishing attacks; limited access to information or services.

Impact -

Policy

74Software implemented a Governance Model for data protection, encompassing a comprehensive framework of policies and procedures designed to safeguard data processing activities, data breach management, and cross-border data transfers. The Information Security Policy serves as the cornerstone of this framework, ensuring the protection of 74Software, its customers, information assets, and information systems from unauthorised access, use, disclosure, alteration, or destruction. This policy not only ensures compliance with legal and regulatory requirements but also supports the Information Security Management System (ISMS) based on ISO/IEC 27001:2022, reinforcing 74Software's commitment to best-in-class cybersecurity practices. In 2025, 74Software also formalised a Group-wide Artificial Intelligence (AI) Policy and Governance Framework, ensuring that the development and use of AI tools and models is aligned with its information security, privacy and regulatory obligations.

The Group is dedicated to preserving the Confidentiality, Integrity, and Availability of its own and its customers' information systems and assets. This commitment is upheld through key principles, including the implementation of cybersecurity controls aligned with business strategies, the assignment of clear accountability for cybersecurity risks, and the regular review and enhancement of policies and procedures to adapt to emerging threats and regulatory developments. By embedding stringent security measures and proactive governance, 74Software ensures the resilience and reliability of its digital infrastructure, fostering trust among stakeholders and safeguarding the integrity of its operations.

Programmes

Both Axway and SBS have Data Protection Compliance Programmes to ensure effective and consistent data protection practices across their operations. These programmes are detailed in the respective Data Protection Policies for each brand and encompass a range of key initiatives designed to strengthen compliance, mitigate risks, and uphold the highest standards of data privacy and security.

The programme includes a centralised data processing register, enabling transparent and structured oversight of data flows within the organisation. Streamlined data breach response procedures ensure swift identification, containment, and mitigation of security incidents, minimising potential impact on individuals and business operations. Mandatory employee training on data protection principles reinforces awareness and compliance, equipping employees with the knowledge required to handle personal data responsibly.

To proactively manage risks, regular assessments of data processing activities are conducted, identifying potential vulnerabilities and ensuring alignment with evolving regulatory requirements. Periodic audits and monitoring further reinforce compliance by evaluating the effectiveness of existing controls and identifying areas for continuous improvement. Additionally, robust contractual measures are in place to ensure that third-party vendors and subcontractors adhere to 74Software's data protection policies and regulatory obligations.

In 2025, these programmes were reinforced through the establishment of a Group-level Security Office. The Security Office is responsible for coordinating cybersecurity governance across 74Software by defining and maintaining security strategy and policies, managing cyber risks and related crises, and ensuring consistent application of security standards across Axway and SBS. Operating under the sponsorship of the Executive Vice President Research & Development and led by the Group Chief Security Officer, the Security Office strengthens the prevention and mitigation of cyber risks that could negatively impact customers and end-users, while enhancing transparency and trust in the Group's security practices.

Through these measures, Axway and SBS demonstrate their commitment to maintaining a secure and compliant data protection environment, reinforcing trust with customers, employees, and stakeholders, while ensuring full adherence to global and regional data privacy laws and industry best practices.

IROs**Data transaction and security**

Reputational, legal and economic risk due to cyber-attacks (business loss due to shut down, loss of contracts, legal expenses, ransomware attacks).

Risk**Policy**

74Software maintains a Governance Model for data protection, ensuring the highest standards of security and compliance across its operations. This framework encompasses robust policies and procedures addressing key areas such as data processing activities, breach management, and cross-border data transfers. At the core of this model is the Information Security Policy, which safeguards 74Software, its customers, and information assets from unauthorised access, use, disclosure, alteration, or destruction. By enforcing stringent security measures, the Company ensures compliance with legal and regulatory requirements while supporting its Information Security Management System (ISMS), aligned with ISO/IEC 27001:2022. This Governance Model also integrates the Group AI Policy and Governance Framework introduced in 2025.

Committed to Confidentiality, Integrity, and Availability, 74Software upholds a structured approach to information security through key principles. These include the implementation of cybersecurity controls aligned with business strategies, clear accountability for cybersecurity risks, and the continuous review and enhancement of security policies. By integrating proactive risk management and rigorous security standards into its operations, the Group ensures the resilience, reliability, and trustworthiness of its digital infrastructure, reinforcing its position as a secure and responsible technology partner.

Programmes

74Software has established a comprehensive Data Protection Compliance Programme to ensure rigorous data security, privacy, and regulatory compliance across its operations. This initiative reinforces trust and accountability in the handling of personal and sensitive data while upholding the highest industry standards.

In 2025, this programme was strengthened through the creation of a Group-level Security Office. The Security Office centralises cybersecurity governance, risk management, compliance oversight and crisis coordination across the Group, ensuring consistent implementation of security standards and rapid decision-making in the event of major cyber incidents. This structure supports effective escalation processes, regulatory compliance and transparent communication with customers, partners and authorities in the event of security incidents.

A key component of the programme is the centralised data processing register, which enhances oversight and transparency of data flows within the organisation. To strengthen security incident management, streamlined data breach response procedures enable swift identification, containment, and resolution, minimising risks to individuals and business continuity. In parallel, mandatory employee training on data protection principles ensures all personnel understand their responsibilities in handling personal data securely.

To proactively mitigate risks, 74Software conducts regular risk assessments of data processing activities, identifying vulnerabilities and ensuring alignment with evolving regulatory requirements. Periodic audits and monitoring reinforce compliance by evaluating existing controls and identifying opportunities for continuous improvement. Additionally, robust contractual measures ensure that third-party vendors and subcontractors adhere to 74Software's data protection policies and legal obligations.

Through these measures, the Group maintains a secure, transparent, and compliant data protection framework, demonstrating its commitment to safeguarding customer, employee, and stakeholder data while adhering to global and regional data privacy regulations.

IROs**Data transaction and security**

A successful cyberattack could result in loss of access to critical IT tools and significant financial losses due to operational downtime.

Risk**Policy**

To mitigate such risks, 74Software maintains a Governance Model for data protection, reinforcing its commitment to security, regulatory compliance, and risk management. This framework comprises a structured set of policies and procedures designed to safeguard data security across key areas, including data processing activities, breach management, and cross-border data transfers. At its core is the Information Security Policy, which protects 74Software, its customers, and all associated information assets and systems from unauthorised access, misuse, disclosure, alteration, or destruction. This policy ensures compliance with global legal and regulatory requirements, supporting the Company's Information Security Management System (ISMS) in accordance with ISO/IEC 27001:2022 standards. This Governance Model also integrates the Group AI Policy and Governance Framework introduced in 2025.

To prevent cyber incidents that could disrupt operations, the Group is committed to maintaining the Confidentiality, Integrity, and Availability (CIA) of its own and its customers' information assets. To uphold these principles, 74Software has implemented rigorous cybersecurity controls, aligned with business strategies, ensuring continuous monitoring, risk mitigation, and clear accountability for cybersecurity risks. Policies and procedures undergo regular reviews and updates to reflect emerging threats, technological advancements, and evolving regulatory landscapes, strengthening the Company's resilience against cyber threats and minimising the risk of operational disruptions.

Programmes

74Software has established a comprehensive Data Protection Compliance Programme to uphold the highest standards of data security, regulatory adherence, and risk management. This programme is designed to ensure effective and consistent data protection practices across all operations, mitigating risks and reinforcing stakeholder trust.

In 2025, this programme was reinforced through the establishment of a Group-level Security Office. The Security Office structures cybersecurity governance across dedicated domains including governance, risk and compliance, enterprise infrastructure security, software security and SaaS security. By centralising cybersecurity oversight, incident coordination and crisis management, this organisation strengthens operational resilience, limits the risk of service disruption and supports the continuity of critical IT tools and services.

As part of this initiative, the Group maintains several key measures, including the maintenance of a centralised data processing register to provide clear oversight of all data-related activities. Streamlined data breach response procedures ensure prompt identification, containment, and resolution of security incidents, minimising potential impacts.

To strengthen internal awareness and compliance, 74Software mandates comprehensive employee training on data protection principles, ensuring all staff members are well-versed in their responsibilities regarding personal and sensitive data handling. Regular risk assessments are conducted to proactively identify vulnerabilities in data processing activities, enabling continuous improvement in security measures.

Further reinforcing compliance, the Group performs periodic audits and monitoring to assess adherence to internal policies and external regulatory requirements. Additionally, stringent contractual obligations are imposed on third-party vendors and subcontractors, ensuring that all external partners comply with the 74Software's data protection and security standards.

IROs**Customer Experience**

Economic, reputational, and legal risks arising from poor client relationships or inadequate consideration of clients (as end-users), potentially resulting in business impacts such as dissatisfaction or contract loss.

Risk**Policy**

74Software applies a customer-centric approach across the Group, built on the principles of engaging with customers, collecting feedback, analysing insights and acting on them to improve products and services.

Feedback is gathered through channels such as surveys, interviews, user groups, community forums and advisory councils. These insights are analysed to identify trends and opportunities for improvement, and actions are taken to enhance customer support, product development and service delivery.

Within this shared philosophy, the implementation of customer experience practices differs slightly across entities. Axway applies a four-step model based on Engage, Listen, Analyse and Act, as reflected in its customer experience strategy. SBS follows a closely related cycle of Listen, Understand and Act, reflecting its specific customer base and interaction patterns. Both frameworks are aligned in ensuring that customer feedback is systematically integrated into continuous improvement processes.

This policy ensures that customer feedback drives continuous improvement and strengthens relationships, supporting sustainable business growth.

Programmes

74Software implements several programmes to support customer engagement, feedback collection and continuous improvement across the Group. At Group level, customer feedback is collected through surveys, interviews, user groups, forums and advisory councils. The Group also promotes internal customer-centric practices through a common set of guiding principles (referred to as the 10 CX Principles or the 10 Golden Disciplines depending on the entity), which educate employees on core customer experience guidelines and help drive consistent, customer-centric behaviour across 74Software.

Within this shared framework, each entity applies programmes tailored to its customer base. Axway implements the Voice of the Customer (VoC) programme, which collects feedback through surveys, interviews and forums, and the Close the Loop programme, which ensures that feedback is reviewed and acted upon through issue resolution and improvement actions.

SBS applies the Customer Journey Map, which supports the understanding of expectations and needs throughout the customer journey. These programmes collectively support the integration of customer feedback into product development, support processes and service delivery, reinforcing customer-centric practices across the organisation.

IROs**Customer Experience**

Business opportunities driven by a strong reputation, client appeal, and loyalty, resulting from positive relationships and attentive consideration of clients (as end-users).

Opportunity**Policy**

74Software applies a customer-centric approach across the Group, built on the principles of engaging with customers, collecting feedback, analysing insights and acting on them to improve products and services.

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Within this shared philosophy, the implementation of customer experience practices differs slightly across entities. Axway applies a four-step model based on Engage, Listen, Analyse and Act, as reflected in its customer experience strategy. SBS follows a closely related cycle of Listen, Understand and Act, reflecting its specific customer base and interaction patterns. Both frameworks are aligned in ensuring that customer feedback is systematically integrated into continuous improvement processes.

This policy ensures that customer feedback drives continuous improvement and strengthens relationships, supporting sustainable business growth.

Programmes

74Software complements its core customer experience processes with programmes designed to deepen customer engagement and strengthen long-term relationships across the Group. At Group level, customer-centric practices are supported by the 10 CX Principles/10 Golden Disciplines, which promote consistent, customer-oriented behaviour among employees. Customer engagement is further reinforced through activities such as user groups, community forums, advisory councils, product update webinars, customer events and the internal sharing of customer stories to build awareness and understanding of customer needs.

Within this shared framework, entities apply additional initiatives tailored to their context. At Axway, product enhancement ideation is supported through the Ideas Portal, which gathers and prioritises customer-driven product improvement suggestions. At SBS, a strong emphasis is placed on follow-up through three levels of action plans aimed at improving the level of service at customer level, product level and SBS-wide level.

IROs

Financial Inclusion

Extending banking services to underserved populations, including low-income individuals and small businesses in Africa, by providing basic services such as deposit and withdrawal facilities.

Impact +

Policy

SBS's Core Amplitude solution provides comprehensive banking capabilities for financial institutions, including microfinance institutions (MFIs). SBS has developed a microcredit module and a commercial offering tailored to African markets, recognising the vital role of microfinance in driving economic empowerment within African communities. Designed with customer feedback, the module addresses the economic realities and challenges faced by individuals and micro-enterprises in these regions. By leveraging Core Amplitude's functionality, it enables MFIs to manage and scale their operations while offering flexible financial products to their clients. This positions SBS as a key partner in advancing financial inclusion and fostering positive change across Africa.

Programmes

74Software, through its SBS products, supports the expansion of digital banking and mobile money services in rural and remote areas. This initiative involves partnerships with telecommunications companies and financial technology firms to facilitate the deployment of mobile banking services. Key actions include collaborating with telecommunications operators to enhance network coverage in targeted areas and developing technology solutions tailored to the needs of local populations. At the end of 2025, more than 40 microfinance institutions in Africa were using the SBS Core Amplitude system to support their financial activities, particularly in Sub-Saharan countries.

IROs

Financial inclusion

Enhancing local economies and improving the quality of life for local populations.

Impact +

Policy

74Software's SBS division actively supports financial inclusion by providing innovative banking solutions that empower individuals and businesses in underserved markets. Through its Core Amplitude solution, SBS equips financial institutions, including microfinance institutions (MFIs), with comprehensive banking capabilities designed to facilitate economic growth and local development.

Recognising the vital role of microfinance in driving economic empowerment, SBS has developed a dedicated microcredit module and commercial offering tailored to African markets. Built in collaboration with customers, this solution directly addresses the economic realities and challenges faced by individuals and micro-enterprises in these regions. By leveraging Core Amplitude's functionality, MFIs can expand their reach, manage financial services efficiently, and provide accessible, flexible financial products to those who need them most.

By enabling small businesses and individuals to access credit, SBS contributes to stimulating local economies, fostering entrepreneurship, and improving overall quality of life. This commitment reinforces SBS's position as a key partner in advancing financial inclusion, supporting sustainable economic development and creating long-term positive change across Africa.

Programmes

74Software, through its SBS products, supports the expansion of digital banking and mobile money services in rural and remote areas. This initiative involves partnerships with telecommunications companies and financial technology firms to facilitate the deployment of mobile banking services. Key actions include collaborating with telecommunications operators to enhance network coverage in targeted areas and developing technology solutions tailored to the needs of local communities.

IROs**Digital accessibility**

Digital accessibility is subject to a strengthening regulatory landscape, which requires adapting to new rules and standards to avoid any legal issues.

Risk**Policy**

74Software takes into consideration digital accessibility issues for its users, including persons with disabilities, in the context of its activities and the evolution of its products and services. These issues are addressed through the Group Accessibility Policy, which sets out general principles, orientations and governance arrangements intended to guide the Company's approach to digital accessibility.

The policy aims to encourage the integration of accessibility considerations during the design, development and evolution phases of solutions, taking into account usage contexts, technical constraints, product maturity and applicable regulatory frameworks. In this respect, it refers to key existing frameworks, including the European Accessibility Act (EAA), the Web Content Accessibility Guidelines (WCAG) and, where relevant, the French General Accessibility Improvement Framework (RGAA), without implying a uniform or immediate level of compliance across all solutions.

The policy covers the scope of customer-facing digital products and interfaces, following a progressive and proportionate approach. Its governance is ensured at Group level, under the sponsorship of the Chief R&D Operations, with coordination across the relevant functions. Operational implementation is led by the Digital Sustainability Officer, with the support of digital sustainability representatives within the product teams, who contribute to the integration of accessibility considerations into design, development and testing activities, where relevant.

Within this framework, 74Software seeks to take accessibility into account from the earliest stages of reflection and throughout the product life cycle, as part of a continuous improvement approach, with the objective of limiting the risk of user exclusion and supporting, over time, the robustness of solutions and their compliance with applicable requirements.

Programmes

Key programmes include regular product audits, with Conformance Reports generated using the VPAT 2.4 template to assess compliance with WCAG 2.1. These audits inform prioritised action plans to address identified accessibility issues. To strengthen these efforts, 74Software is adopting VPAT 2.5 to proactively align with WCAG 2.2 criteria and is integrating automated accessibility testing within the CI/CD pipeline. Furthermore, mandatory accessibility training for all R&D personnel is delivered through 74Software University, ensuring a consistent understanding of accessibility best practices across the organisation.

2.6.3 Data and transaction security (S4-2, 3, 4, 5)

As cloud computing, artificial intelligence, and digital platforms continue to reshape the way organisations operate, 74Software remains at the forefront of delivering efficient and secure data management solutions. In the core banking and asset finance sectors, as well as in the enterprise data management business where SBS and Axway operate, the critical importance of data security and privacy is fully recognised and embedded in our approach. The company maintains an unwavering commitment to data protection and regulatory compliance, ensuring alignment with all relevant data privacy regulations for 74Software, its customers, and their end-users.

This shared commitment underpins 74Software's approach to data protection, covering all aspects of data handling – from collection and processing to storage and transmission. Axway, leveraging its expertise in enterprise data management solutions, provides the foundation for secure and efficient data flows within SBS and across operations, supporting the evolving needs of customers and the industry.

To further demonstrate this commitment, Axway currently holds industry-recognised certifications, including ISO 27001, SOC 2 Type 2 for support and SaaS services, and Common Criteria EAL4+ for one product.

Similarly, SBS maintains a robust security framework, holding certifications such as CyberVadis - 1, ISO 27001, SOC - 1 Report Type 2, ISAE 3402 - Report Type 2, NIST 800 - 53, and Cyber Essentials - 2.

2.6.3.1 Processes for engaging with consumers and end-users about impacts (S4-2)

74Software ensures that consumers and end-users are well-informed about the impact of information security on their data and privacy. Security measures are communicated through multiple channels, including email, in-app notifications, and social media, ensuring broad audience reach. The Company's transparency policy provides clear and accessible information about data protection practices, the types of data collected, and how it is used. A dedicated feedback mechanism enables users to ask questions and report concerns, ensuring timely and effective responses from the team.

Additionally, 74Software regularly updates users on any changes to information security policies and practices. Educational programmes are implemented to raise awareness about data security, offering practical guidance on maintaining personal data protection. All communications adhere to relevant regulations and industry standards. Communication strategies are continuously reviewed and refined based on user feedback and the evolving security landscape.

The effectiveness of engagement with consumers and end-users is evaluated through external audits, contractual commitments, and regulatory compliance. Depending on the agreement, Axway and SBS maintain ISO 27001 certification, undergo ISAE 3402 or SOC2 Type 2 audits, and, for Managed Services customers, implement a Security Management Plan (SMP) with annual external audits. Additionally, compliance with GDPR and other data protection regulations ensures that end-users can exercise their right to information, reinforcing transparency and continuous improvement.

To further strengthen security and foster user participation, Axway has developed a Responsible Disclosure programme, www.axway.com/en/customers/axway-responsible-disclosure-policy, that invites consumers and end-users to participate in improving data security for the benefit of all customers.

Similarly, SBS has a bug bounty programme in place for the same purpose <https://sbs-software.com/insights/bug-bounties/>.

The responsibility for engaging with consumers and end-users on data security and privacy is shared between the 74Software Chief Information Security Officer (CISO), who oversees data security, and the 74Software Data Protection Officer (DPO), who manages data privacy. Both roles collaborate to ensure that engagement outcomes drive continuous improvements in 74Software's data protection approach, reinforcing transparency, compliance, and trust.

2.6.3.2 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)

74Software is committed to identifying, addressing, and mitigating risks related to information security. The Data Protection Compliance Programme provides a structured framework for reporting and managing suspected or actual personal data breaches. This includes rapid incident detection, coordinated response processes, in-depth investigations, root-cause analysis, and the implementation of corrective and preventive measures. Regular audits and reviews further strengthen the effectiveness of these safeguards and ensure alignment with legal and regulatory requirements.

To support transparency and reinforce user trust, 74Software offers multiple channels for reporting information security concerns, including dedicated support portals, email, and in-app feedback options. All reports are handled with priority to ensure timely and appropriate responses. Clear communication on how to raise concerns is embedded within the Data Protection Compliance Programme, ensuring that reporting mechanisms remain accessible, well-understood, and reliable for both consumers and end-users. Ongoing evaluations help maintain their effectiveness and alignment with contractual and regulatory obligations.

Additionally, the company provides strong protections for individuals reporting suspected corruption or bribery, in full accordance with its whistleblowing procedure. These safeguards ensure confidentiality, protect against retaliation, and promote a culture of integrity and accountability across the organisation.

2.6.3.3 Taking action on material impacts, managing related risks and opportunities (S4-4)

74Software proactively mitigates potential negative impacts on consumers and end-users through rigorous internal security practices. In 2025, the Group strengthened its overall management of data, transaction, and cybersecurity risks by establishing a Group-level Security Office. This new structure enhances coordination, consistency, and transparency across Axway, SBS, and Group-level operations. The Security Office defines the Group's security strategy and policies, oversees cyber risk management and security incidents, and ensures alignment with regulatory, contractual, and customer requirements. It also acts as a central governance body, supporting the monitoring and continuous improvement of security practices across all entities.

To structure its activities, the Security Office organises its work around four main areas covering governance, risk and compliance management, enterprise infrastructure security, software security, and the protection of cloud and SaaS services delivered to customers. This organisation promotes harmonised practices and effective coordination while maintaining proximity to operational teams and customer needs.

Daily security operations—including incident management, customer interactions, and audit activities—are carried out by local security teams within Axway and SBS, each led by dedicated local security leadership. This governance model blends Group-wide oversight with local accountability, ensuring robust management of data and transaction security risks while preserving customer trust.

74Software has implemented clear incident reporting procedures for both employees and third parties, ensuring the prompt notification of suspected or actual data breaches. These procedures are supported by a comprehensive data breach response plan detailing the steps for containment, investigation, remediation, and notification of affected individuals, fully aligned with applicable legal and regulatory requirements.

To ensure effective implementation and adherence to data security procedures, 74Software provides comprehensive training to all employees on data security best practices. This includes incident reporting protocols, secure data handling guidelines, and awareness of emerging threats. The Company aims for a 100% annual training completion rate, accounting for updated modules and new employee onboarding. Since 74Software was formally created in 2024, the implementation of its security and privacy programmes began last year and continues to mature. As a result, reporting now includes progress on incident reviews, training completion rates, and assessments of the effectiveness of the data breach response plan, with further refinements planned for upcoming reporting periods.

Additionally, The Group also ensures that individuals can easily exercise their rights under data protection laws through accessible channels, including a dedicated contact point, online request forms, and clear guidance on submitting inquiries or complaints. These processes are regularly reviewed and updated to reflect

regulatory developments and industry best practices. No severe human-rights-related incidents involving consumers or end-users were reported during the period.

2.6.3.4 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5)

All 74Software employees and contractors are required to complete a security awareness training, with a particular focus on teams handling confidential customer data, such as technical support and cloud/SaaS operations teams.

74Software places strong emphasis on data protection, transactional integrity, and security excellence, setting rigorous targets aligned with recognised industry standards. This commitment is supported by a comprehensive set of security certifications, reviewed annually to maintain full compliance and operational effectiveness.

The Company conducts an annual scenario analysis, considering evolving cyber threats, regulatory changes (e.g., GDPR), and the increasing complexity of data environments. These insights inform risk assessments grounded in industry-recognised frameworks such as the NIST Cybersecurity Framework and ISO 27001, ensuring practices remain aligned with customer and stakeholder expectations.

Risk assessments are conducted based on data sensitivity, potential breach impact, and system vulnerabilities, with a continuous evaluation of the evolving threat landscape. 74Software leverages diverse data sources, including SIEM systems, Intrusion Detection and Prevention Systems (IDPS), vulnerability scanning tools, and incident logs, ensuring a reliable and comprehensive security posture.

Key performance indicators (KPIs) such as incident count, response time, vulnerability remediation, and compliance rates are meticulously tracked and reviewed annually. These indicators are analysed across both the build and run phases, ensuring security considerations are embedded throughout the software lifecycle. Insights from operational monitoring also support customer communications, strengthening transparency and alignment with client expectations. Customers are actively engaged throughout their lifecycle with 74Software, as detailed in the Customer Engagement chapter.

74Software complies with relevant regulations and standards, including GDPR, and industry-specific requirements like PCI DSS where applicable:

- **Axway:** ISO 27001, SOC 2 Type 2 (support and SaaS), Common Criteria EAL4+.
- **SBS:** CyberVadis – 1, ISO 27001, SOC – 1 report type 2, ISAE 3402 report – type 2, NIST 800 – 53, Cyber Essentials – 2.

These certifications serve as independently verified proof of adherence to international best practices.

Security targets are aligned with business objectives, technological advancements (such as cloud computing and IoT), and growing social awareness of data privacy. The Company also accounts for geographical context and the varying legal requirements that apply across different regions.

74Software’s approach is based on the following core assumptions:

- the effectiveness of certified security technologies and tools is validated through continuous assessment and adherence to industry standards;
- employee awareness is reinforced through ongoing training, though the potential for human error is acknowledged as a security consideration;
- the evolving threat landscape is continuously monitored to ensure that risk assessments are regularly updated, and security strategies remain proactive and adaptable. Security investments are aligned with prioritised risks, ensuring resources are allocated efficiently to enhance protection measures.

By adhering to these methodologies and maintaining certifications, 74Software upholds strong data protection and cybersecurity standards that meet customer and stakeholder expectations.

74Software’s security targets are structured across different time horizons, ensuring continuous progress and adaptation to an evolving risk landscape. Short-term targets focus on maintaining key security certifications, such as ISO 27001 and SOC 2 Type 2, and achieving 100% completion of mandatory security awareness training for all employees. These targets are set annually, using the best results from the previous year as a benchmark; for example, 2026 objectives will be established based on 2025 performance outcomes.

Medium-term targets aim to strengthen resilience by improving vulnerability remediation processes, reducing incident response times, and expanding the bug bounty programme to proactively identify and mitigate threats. Long-term targets concentrate on sustaining alignment with evolving cybersecurity regulations, anticipating emerging risks, and embedding security best practices more deeply into software development and operational processes. Together, these commitments support a secure and compliant digital environment.

The following table provides an overview of the security training hours completed during the reporting period.

Information security training

	2024		2025	
	Axway	SBS	Axway	SBS
Trained employees	469	1,978	1100	821
Annual Target	100%	100%	100%	100%
Frequency	Once per year mandatory	Once per year mandatory	Once per year mandatory	Once per year mandatory
Duration	1 hour	20 minutes	30 minutes	4h30

Beyond the mandatory information security training included in the table, 74S employees completed a wide range of additional courses on cybersecurity, data protection, and secure data handling, reinforcing a strong security culture across the organisation.

2.6.4 Customer experience (S4-2, 3, 4, 5)

The Customer Success structure is a core component of 74Software's business model, designed to maintain continuous dialogue with customers and provide tailored, scalable solutions that align with their evolving expectations. As 74Software works toward a unified approach, this vision is jointly carried by both Axway and SBS. Leveraging this shared foundation, Axway and SBS implement customer experience strategies tailored to their respective business models.

Axway's Customer Experience (CX) strategy is built upon four key pillars: Engage, Listen, Analyse, and Act. The Company fosters strong relationships by engaging with customers and partners through user groups, community forums, and other key touchpoints. Axway actively listens to customer feedback through surveys, interviews, and its Voice of the Customer (VoC) programme, leveraging this data to understand needs and preferences while promoting a customer-centric culture across the organisation. By analysing these insights, Axway identifies areas for improvement and innovation.

Acting on this feedback, the Company implements targeted initiatives to improve user experiences and enhance customer satisfaction, ultimately driving loyalty, advocacy, and business growth through a competitive advantage in Customer Experience.

Key performance metrics related to customer experience and success are presented annually to the Board of Directors and the Appointments, Governance, and Corporate Responsibility Committee, as well as internally to employees during dedicated sessions.

Axway relies on a suite of customer management tools, including an experience management platform, a Customer 360° dashboard, and customer success plans. These tools collect and analyse customer feedback, consolidate data from various sources, and define strategic objectives that align with customer expectations. Insights gathered through these mechanisms directly inform Axway's software design, research, and development efforts, ensuring that customer needs remain at the heart of innovation.

For SBS, customer satisfaction is a central pillar of its strategy, championed by the CEO and senior executives. The company is committed to delivering exceptional customer experiences at every touchpoint, guided by three core principles: Understand, Listen, and Act. To gain comprehensive insights into customer interactions, challenges, and pain points, SBS employs multiple feedback channels, including annual surveys, touchpoint surveys throughout the customer journey, and a dedicated User Club for regular engagement. These mechanisms enable SBS to identify critical areas for improvement and implement targeted actions to enhance customer experience. Based on these insights, SBS implements mandatory corrective actions at three levels: customer, product, and internal SBS processes. At the customer level, specific concerns raised by clients are addressed to improve direct interactions and service quality. At the product level, feedback is used to refine solutions, enhancing functionality and usability. At the internal process level, SBS optimises workflows to better support customer needs.

This commitment to customer satisfaction is supported by dedicated teams across all business units and regions, comprising professionals who work to ensure customer-centric improvements. Additionally, SBS has established a Customer Reference Programme, leveraging satisfied customers as brand ambassadors to demonstrate the value of its products, reinforcing trust, credibility, and long-term engagement with its client base.

2.6.4.1 Processes for engaging with consumers and end-users about impacts (S4-2)

At 74Software, customer engagement is a strategic priority and a key process to understand, monitor and address the impacts of our products and services on consumers and end-users. The Company hosts annual regional customer conferences, advisory councils with selected members, and frequent user groups to foster collaboration, provide product updates, and share best practices.

In 2025, Axway organised 86 customer engagement events, while SBS launched several key customer engagement initiatives, including the SBS Summit, the five regional Connect events (Dallas, Antwerp, Paris, London, Casablanca), Customer Groups and CEO Round Tables.

Customers highly value the opportunity to connect and learn from one another. To further enhance engagement, Axway distributes newsletters with valuable resources and updates, maintains an active community discussion forum, and provides an "idea" portal where customers can suggest product enhancements. The peer-to-peer programme, launched in 2024, continues to facilitate customer connections and knowledge exchanges.

The effectiveness of customer engagement is measured through key performance indicators (KPIs), including but not limited to event participation rates, engagement with newsletters and written communications, and Net Promoter Score (NPS). These metrics enable continuous improvement in customer interactions and ensure that engagement initiatives remain meaningful and impactful.

2.6.4.2 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)

When concerns or negative feedback are raised, both Axway and SBS promptly engage with the customers concerned, actively listening to and acknowledging their issues. Feedback collected through established customer channels is then escalated to the relevant departments for investigation and remediation. Through this structured process, 74Software aims to address potential negative impacts, resolve issues efficiently, enhance customer satisfaction, and prevent similar situations from occurring in the future.

Ensuring that customers understand and trust the remediation process is a key priority for 74Software. Customer awareness is regularly assessed through multiple touchpoints, including contract negotiations, ongoing customer engagement, and user group interactions. During contract discussions, escalation paths are clearly communicated to ensure transparency. Throughout the customer relationship, surveys and feedback channels embedded in support portals are used to evaluate customer understanding and experience of the process. User group sessions further support open dialogue, enabling customers to ask questions and raise concerns directly. In parallel, 74Software monitors the use of feedback channels and analyses reported issues to identify opportunities for continuous improvement, ensuring that remediation mechanisms remain effective and trusted.

Additionally, 74Software maintains a robust whistleblowing policy that provides a safe and confidential channel for reporting concerns, including negative feedback or potential misconduct. The policy guarantees protection for individuals who raise concerns in good faith and explicitly prohibits any form of retaliation. It is publicly available on the 74Software website, ensuring transparency and accessibility for all stakeholders. This framework reinforces the Company's commitment to ethical conduct and open communication, fostering an environment in which concerns can be raised and addressed without fear of reprisal.

2.6.4.3 Taking action on material impacts, managing related risks and opportunities (S4-4)

To improve the customer experience, Axway is implementing a range of targeted actions aimed at strengthening customer engagement and simplifying interactions. These actions include expanding engagement opportunities, improving knowledge-sharing between customer-facing teams and key internal functions such as Support, R&D and Finance, and investing in internal tools to enhance employee efficiency. Together, these initiatives contribute to a better understanding of customer needs and enable more responsive and consistent support.

Axway is also streamlining contractual processes by simplifying contracts and increasing automation within the legal review process, reducing complexity and turnaround times. In parallel, customer learning content is being revised to ensure it is clearer, more accessible and better aligned with everyday user needs. To further support a smooth customer journey, the Company has introduced an Axway Managed Cloud onboarding survey to collect structured customer feedback at an early stage of the relationship.

At SBS, actions focus on strengthening support responsiveness through close and trusted customer relationships. Account managers play a central role by developing an in-depth understanding of customer business needs and acting as long-term partners. This approach is supported by a comprehensive customer engagement framework based on progressive touchpoint surveys covering the entire customer journey, including purchase, renewal, support interactions, training and events. Insights gathered through these surveys are used to build detailed customer journey maps, identify key expectations

and pain points, and define targeted action plans at both product and customer levels.

To ensure a structured and consistent approach, 74Software has organised its customer engagement and support initiatives across short-, medium- and long-term horizons. Short-term actions focus on onboarding surveys, contract simplification and improvements to customer learning content. Medium-term priorities include strengthening cross-functional collaboration, enhancing customer journey mapping and optimising internal tools. Over the longer term, the Company will continue adapting learning content to evolving customer needs, expanding automation in support and contract management, and refining engagement strategies based on customer feedback and market trends.

74Software seeks to prevent material negative impacts on consumers and end-users through proactive risk management, strong compliance frameworks and continuous monitoring. Consumer protection principles are embedded in operational processes through adherence to regulatory requirements and industry standards. Regular audits, compliance checks and feedback mechanisms support the early identification of potential risks and the implementation of corrective actions where necessary.

Where actual impacts on consumers or end-users have been identified, the Company takes action to provide or enable appropriate remedy. Dedicated customer-facing teams assess the issue, engage directly with the affected customer, and coordinate corrective measures such as enhanced support, product adjustments, or process improvements. Root-cause analyses are carried out to prevent recurrence, and follow-up communication ensures that the customer confirms the effectiveness of the remedy. When relevant, insights from these cases are incorporated into broader customer journey improvements, compliance processes, and risk-mitigation measures to ensure a consistent and proactive approach to remediation.

Progress is monitored using both quantitative and qualitative indicators. At Axway, expanded engagement activities resulted in 86 Customer Engagement events, 15 Advisory Council meetings, and 71 User Groups, involving more than 1,644 customers. The Axway University platform further supports customer adoption through structured, on-demand training. At SBS, the introduction of customer journey mapping and progressive surveys has significantly improved service tracking, with higher response rates providing valuable insights to continuously refine customer interactions.

Finally, 74Software allocates dedicated human and technological resources to managing material impacts on consumers and end-users. Customer experience, product development and compliance teams work together to ensure alignment with regulatory requirements and best practices. Financial resources support customer engagement programmes, data protection and security measures, and ongoing platform enhancements. Employee training programmes further strengthen the Company's ability to engage effectively with customers and mitigate potential negative impacts.

The effectiveness of actions and initiatives is assessed through a combination of customer feedback surveys, engagement metrics, and compliance monitoring. Touchpoint surveys, onboarding questionnaires, and participation levels in advisory councils and user groups provide ongoing insights. These results are regularly reviewed by cross-functional teams to ensure initiatives improve outcomes for consumers and end-users.

2.6.4.4 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5)

Customer satisfaction at Axway and SBS is primarily monitored through the Net Promoter Score (NPS), a key indicator embedded in Axway's risk management framework and used as a performance metric for the variable compensation of eligible employees, including the Chief Executive Officer. The NPS methodology classifies customers into three categories—Detractors, Passives and Promoters—based on surveys, follow-up discussions and continuous dialogue throughout the year.

Beyond its role as a performance indicator, NPS is a central engagement mechanism that directly involves customers in assessing satisfaction and service quality. Results from previous years are used to define annual satisfaction targets, ensuring that customer feedback actively informs 74Software's objectives and continuous improvement efforts.

To complement the quantitative results, 74Software systematically engages with customers to better understand the drivers behind NPS scores. Follow-up discussions are conducted, with

particular attention given to Detractors, to identify root causes, validate improvement actions and address key pain points. In parallel, a dedicated user club programme brings together Promoters to foster ongoing dialogue and collaboration. These exchanges provide valuable insights into customer expectations and support the continuous enhancement of the Company's services and solutions.

In 2025, Axway achieved a Net Promoter Score of +55, exceeding its target of +53. This level reflects strong customer satisfaction in a B2B software context where expectations remain high and continue to increase. In line with Axway's continuous improvement approach, the Company has set a target of +56 for the next measurement cycle, reflecting the ambition to sustain this performance and make incremental progress year on year. In parallel, SBS recorded a Net Promoter Score of +38.2 in 2025, representing a significant improvement compared to the previous year (+7). Building on this momentum, SBS has defined a target of +42 for the next survey cycle, reflecting its ambition to further strengthen customer satisfaction and engagement.

In addition to NPS, Axway also measures the Customer Engagement Score (CES), an internal index designed to assess customer interactions across various engagement touchpoints. Engagement activities are weighted based on their relevance and recency, resulting in an individual score for each customer, typically ranging from 1 to 100. This indicator enables the Company to track engagement trends, identify at-risk customers and take proactive actions to strengthen long-term relationships.

Together, NPS and CES provide a comprehensive view of customer satisfaction, engagement and overall relationship health, supporting the management of material impacts, risks and opportunities related to consumers and end-users.

2.6.5 Financial inclusion (S4-2, 3, 4, 5)

Financial inclusion is a key driver of economic development, ensuring that underserved populations have access to essential financial services. Recognising the importance of microfinance in fostering economic empowerment across African communities, SBS has developed a microcredit module and a commercial offering tailored to the specific economic realities faced by individuals and micro-enterprises in these regions.

SBS's microfinance solutions leverage the capabilities of Core Amplitude, enabling microfinance institutions (MFIs) to efficiently manage, scale, and diversify their operations. Designed for clients traditionally excluded from formal banking systems, these products offer flexible services including savings, credit, money transfers, and insurance. By providing a reliable and comprehensive suite of microcredit tools, SBS contributes to the development of financial literacy, supports entrepreneurship, and encourages local economic growth. The implementation of this strategy is overseen by the General Manager of the Core

Amplitude business unit, under the supervision of the executive committee, with progress monitored through quarterly business reviews.

To reach a broad and often hard-to-access client base, SBS relies on a flexible distribution network combining physical branches, mobile branches, merchant networks, and strategic partnerships. This approach ensures that even populations without access to conventional banking channels can benefit from tailored financial services.

Overall, SBS's microfinance offering strengthens financial inclusion by expanding access to banking services for underserved communities. The initiative promotes economic empowerment, stimulates local development, and contributes to improving living standards, reaffirming SBS's commitment to inclusive finance.

2.6.5.1 Processes for engaging with consumers and end-users about impacts (S4-2)

SBS has a long-standing commitment to engaging with customers in Africa to understand local financial needs and tailor its Core Amplitude solution, including the microcredit module. This engagement relies on extensive market research, needs assessments, and direct interactions with communities through interviews, focus groups, and dialogue with local organisations. These efforts provide SBS with a detailed understanding of the financial challenges faced by individuals and micro-enterprises.

The execution of this customer engagement strategy is co-led by the Clients & Growth Department and the Core Amplitude General Manager. The implementation of the resulting actions is overseen by the General Manager of the business unit, under the supervision of the executive committee, with progress monitored through quarterly business reviews.

SBS promotes collaborative dialogue with key stakeholders – including microfinance institutions, regulators, technology partners, and community representatives – to identify both opportunities and barriers to financial inclusion. Transparency and financial education are central to this approach, with initiatives designed to ensure customers fully understand financial products and benefit from culturally relevant financial literacy programmes.

Pilot initiatives and iterative development cycles allow SBS to test and refine its microcredit module in real-life conditions, integrating user feedback and adapting services to local contexts. Findings from these pilots, combined with market growth indicators, guide continuous improvement of the solution. A concrete example of this long-term commitment is SBS's partnership with Scholaris Finance SA in Mali and Burkina Faso, which provides financial tools enabling households to access funding for school supplies, educational materials, and studies abroad.

Through these actions, SBS supports responsible borrowing, strengthens financial literacy, and continually enhances product accessibility—reinforcing its commitment to inclusive and ethical financial services.

2.6.5.2 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)

SBS's microfinance solution is designed to promote financial inclusion while upholding responsible lending practices. To mitigate potential negative impacts, SBS has established robust remediation processes, including strong debt management frameworks, dedicated support for vulnerable groups, and strict data privacy and security protocols. Continuous monitoring, regular reporting, and independent audits help assess the effectiveness of these measures and guide ongoing improvements in line with evolving financial inclusion needs in Africa.

Concerns raised by consumers are systematically reviewed through clearly defined procedures, including response timelines and corrective measures such as loan restructuring or enhanced data protection protocols. In parallel, SBS collaborates with its microfinance partners to implement and uphold fair lending policies, prevent over-indebtedness, and deliver targeted financial literacy initiatives.

The whistleblower policy provides borrowers and stakeholders with a secure and confidential channel to report potential misconduct, unfair lending practices, or data privacy breaches. It explicitly prohibits retaliation and ensures that all reports are thoroughly investigated.

To ensure that customers are fully informed about available feedback channels, remediation processes, and the whistleblower mechanism, SBS communicates these procedures proactively. Information is shared during contractual discussions, throughout customer engagement processes, and during user group meetings and other formal or informal interactions. By reinforcing these communication channels, SBS enables customers to raise concerns confidently and contributes to the continuous improvement of its financial inclusion initiatives.

2.6.5.3 Taking action on material impacts, managing related risks and opportunities (S4-4)

74Software, through its SBS products, actively contributes to expanding digital banking and mobile money services in rural and remote areas. To address material impacts and manage related risks, SBS collaborates with telecommunications operators to improve network coverage and ensure reliable access to financial services. Partnerships with financial technology firms also support the development of tailored digital solutions designed to meet the specific needs of local populations.

Although 74Software has not allocated dedicated resources solely for material impact management as of 2024, its existing teams actively monitor risks and implement action plans when needed. This includes proactive risk assessments, rigorous testing protocols, and continuous monitoring of user feedback and market conditions.

The Company also enforces strict data privacy and security measures, adheres to responsible lending practices, and provides financial literacy programmes to mitigate potential risks such as over-indebtedness and data breaches. Transparent communication channels and a publicly communicated whistleblower policy further ensure that consumer concerns are addressed effectively.

These actions not only reduce material risks but also create opportunities by removing barriers to financial inclusion and fostering economic participation. By continuously refining its technology and strengthening partnerships, SBS enhances the resilience of its microfinance solutions, reducing operational risks while maximising positive social and economic outcomes.

2.6.5.4 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5)

Although no formal, time-bound targets have yet been defined, the Company currently monitors the effectiveness of its microfinance solutions through several indicators. These include the number of microfinance institutions using Core Amplitude, the growth of

the customer portfolio, and the geographical expansion of services. Insights derived from these indicators, combined with broader market growth trends, are used to refine the offering and could inform future quantitative target-setting processes.

SBS remains committed to advancing financial inclusion through its partnerships and technological developments, particularly in the expansion of digital banking and mobile money services in underserved areas. Looking ahead, the Company may establish measurable objectives to further strengthen the positive impact and risk-management effectiveness of its initiatives.

2.6.6 Digital accessibility (S4-2, 3, 4, 5)

74Software takes digital accessibility into account when carrying out its activities and when developing or improving its products and services. The Company understands that some stakeholders expect products and services to be accessible and seeks to consider these expectations where appropriate, taking into account how solutions are used, technical limitations and applicable regulations.

In this context, 74Software keeps track of key digital accessibility frameworks, such as the European Accessibility Act (EAA), the Americans with Disabilities Act (ADA) and the Web Content Accessibility Guidelines (WCAG). These frameworks provide general guidance for the Company's approach, without implying that all solutions meet the same level of accessibility or that compliance is achieved immediately across the entire portfolio.

Digital accessibility is part of the Company's broader digital sustainability approach (see ESRS E1). Related topics are coordinated across the relevant teams, under the sponsorship of Xavier Rebeuf, Chief R&D Operations, with oversight at Executive Committee level. Day-to-day implementation is led by the Digital Sustainability Manager, who is part of the CSR Department, with support from digital sustainability contacts within the product teams.

Depending on the market and the specific context, 74Software may refer to existing standards, such as the French General Accessibility Improvement Framework (RGAA) or the Web Content Accessibility Guidelines (WCAG) at international level, to support certain assessments or initiatives. Accessibility considerations may be taken into account during product design or updates, based on a case-by-case assessment.

2.6.6.1 Processes for engaging with consumers and end-users about impacts (S4-2)

74Software is committed to ensuring that its software products are accessible and usable for all consumers and end-users. To support effective engagement on product-related impacts, the Company maintains multiple feedback channels, including user surveys, support tickets, and dedicated customer service teams. These mechanisms allow 74Software to collect insights on software performance and understand how its products may affect users. The effectiveness of this engagement is assessed through follow-up satisfaction surveys, response-time metrics, and discussions linked to the Net Promoter Score (NPS).

Building on these insights, the Company continually refines its engagement processes to ensure that users' concerns are addressed promptly and transparently. This approach supports the ongoing improvement of the user experience and strengthens the long-term value and impact of 74Software's products.

2.6.6.2 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)

To support ongoing accessibility improvements, 74Software conducts regular audits of its products and capabilities, generating Conformance Reports using VPAT, RGAA, or RAAM templates. These reports assess compliance with WCAG 2.1 Level AA and help identify areas requiring enhancement. Based on audit findings, prioritised action plans are incorporated into the product backlog to drive systematic improvements. In addition, accessibility testing is being integrated into the CI/CD pipeline to enable continuous monitoring and early detection of accessibility issues.

All 74Software employees are required to complete mandatory training on accessibility best practices through the respective learning platforms of the Axway and SBS brands. This combination of regular audits, proactive remediation measures, and employee training supports the continuous improvement of digital accessibility across all products and services.

74Software also maintains a robust whistleblower policy that includes concerns related to digital accessibility. This policy offers employees, customers, and stakeholders a secure and confidential channel to report accessibility barriers or instances of non-compliance, and explicitly prohibits retaliation. All reports undergo thorough investigation. To ensure that customers remain well informed about the Company's accessibility audits, action plans, and whistleblower mechanism, 74Software communicates these initiatives through multiple channels, including contractual discussions, customer engagement processes, and open forums during user group meetings. By consistently reinforcing these communication channels, 74Software enables users to raise concerns confidently and contributes to the ongoing enhancement of accessible digital experiences.

2.6.6.3 Taking action on material impacts, managing related risks and opportunities (S4-4)

74Software is committed to ensuring digital accessibility for people with disabilities and to continuously improving the user experience for all individuals while adhering to relevant accessibility standards. The Company designs its products and services to be accessible and provides detailed information on its compliance status, identified non-conformities, testing methodologies, and feedback mechanisms.

The Group's multi-year accessibility plan includes yearly audits of its most consumer-exposed products and capabilities, generating Conformance Reports using the VPAT or RGAA or RAAM templates. These reports assess compliance with WCAG 2.1 level AA and highlight areas for improvement. Based on the audit findings, prioritised action plans are developed and integrated into the product backlog. Additionally, accessibility testing is being automated within the CI/CD process, enabling continuous monitoring and early identification of accessibility issues.

74Software is aligning with the European Accessibility Act (EAA) requirements. Under the EAA, all new web and mobile applications launched after June 2025 must comply with WCAG 2.1 AA, and all existing applications must achieve full compliance by June 2030. Recognising the breadth and complexity of its portfolio, the Company has prioritised accessibility efforts on bank customer-facing components. For new end-user cloud components (e.g., web and mobile banking solutions), 74Software is committed to achieving 100% compliance with WCAG 2.1 AA. For existing components, the Company will conduct comprehensive audits and develop multi-year action plans to address accessibility issues. For legacy components scheduled for replacement within three years and with an accessibility level below 50%, 74Software will prioritise replacement over immediate remediation. For legacy components without planned replacements, the Company will collaborate with customers on a case-by-case basis to determine the most appropriate remediation approach, ensuring efforts are proportionate to risk and impact.

For web and mobile accessibility, 74Software has implemented a three-level action plan. First, the Company integrates web accessibility principles into the design of its new-generation Cloud Native products, built on a proprietary framework developed for its applications. While 74Software uses custom interface components, the framework embeds interface elements that meet RGAA criteria, ensuring compliance with accessibility

standards such as keyboard navigation, contrast ratios, and other usability aspects. These components incorporate ARIA tags, recognised by screen readers, and are structured according to W3C accessibility guidelines, reinforcing 74Software's commitment to delivering inclusive digital services.

As a generic framework alone is not sufficient to ensure meaningful accessibility, 74Software integrates dedicated tools and independent audits. Development tools such as Axe DevTools, Tanaguru, and NVDA are embedded within development processes to assess baseline accessibility. Beginning in 2025, and in addition to CI/CD controls, a dedicated team of auditors independent from the development teams conducts RGAA audits on new web pages before customer delivery, providing detailed accessibility reports to ensure that compliance is rigorously evaluated before products reach end-users.

Web accessibility is a core pillar of digital sustainability at 74Software. Implementation is overseen by the Digital Sustainability Manager, who is directly attached to the CSR function. The Digital Sustainability Manager coordinates digital sustainability referents and RGAA/WCAG auditors, embedded across different product lines. Since 2024, 74Software has three dedicated accessibility auditors responsible for conducting audits across different product lines to ensure impartiality and consistency. These auditors were trained in April 2024 by Ethic First, and 74Software plans to train ten additional auditors in 2026 to initially conduct more than twenty accessibility audits per year.

To ensure the Company's practices do not contribute to material negative impacts on consumers and end-users, 74Software has implemented key safeguards. The Company actively gathers and integrates user feedback through customer support, user groups, and dedicated accessibility feedback forms, enabling timely identification and resolution of accessibility barriers. Thorough risk assessments are conducted during design and development to proactively identify and mitigate accessibility risks before deployment. Comprehensive accessibility training is provided to development and testing teams, equipping them with the knowledge and skills to create accessible digital products. A robust whistleblower policy ensures employees, customers, and stakeholders have a confidential and secure channel to report accessibility concerns without fear of retaliation. The Company is committed to continuous monitoring and improvement, regularly reviewing its accessibility practices, integrating feedback, and applying lessons learned to enhance product inclusivity and user experience.

2.6.6.4 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5)

Prior to 2025, Axway's key targets focused on strengthening its internal capabilities in digital accessibility, including training or hiring UX designers with accessibility knowledge, establishing a design system with clear accessibility guidelines, and conducting initial product audits to assess compliance. In 2025, the focus shifted towards remediating identified accessibility gaps identified during these initial assessments and introducing mandatory accessibility training for all R&D teams. The company aims for all Axway products to reach WCAG 2.0 Level AA compliance by 2027, supported by the deployment of automated accessibility testing processes. Beyond 2027, Axway plans to modernise user interfaces and progressively integrate fully accessible components to achieve higher levels of compliance. Accessibility progress is measured through Accessibility Conformance Reports (ACRs) and Accessibility Statements, which indicate the number and percentage of criteria met. Axway University also tracks accessibility training completion rates across R&D teams, although formalised targets for training coverage have not yet been defined.

In parallel, SBS conducted detailed accessibility audits in 2025 on several strategic components, including Digital Core, Digital Lending, RR, Digital Engagement (web application, iOS application and Android application), SAB Your Portal and EPE. Each audit produced a comprehensive report outlining non-compliant items and defining associated remediation actions. Beginning in 2026, SBS will conduct annual audits based on prioritisation criteria,

enabling continuous improvement, year-over-year progress tracking, and alignment with current and future regulatory requirements. While some customer groups were involved in shaping project requirements, SBS had not yet directly involved customers or end-users in monitoring progress against accessibility objectives as of 2024.

Accessibility compliance levels for each component are monitored monthly by the Digital Sustainability Sponsor, who serves as EVP Research & Development, and reviewed quarterly by the Executive Committee.

Across both brands, 74Software has set a long-term ambition to achieve full digital accessibility compliance across its entire product portfolio by 31 December 2030. This will require either upgrading existing products to meet the latest applicable standards – such as WCAG 2.2 Level AA – or replacing non-compliant products with fully accessible alternatives. This objective reflects 74Software's commitment to ensuring that all users, regardless of ability, can access its digital solutions.

The roadmap for accessibility upskilling follows a phased approach to ensure that employees involved in product development integrate accessibility best practices. In 2025, 24 UX/UI designers, 14 mobile developers, 105 web developers and 10 UI testers received training, with priority given to teams working on consumer-facing components. From 2026 to 2030, 74Software plans to train approximately 150 UX/UI designers and developers annually, ensuring a steady expansion of accessibility expertise across R&D.

The Digital Sustainability Sponsor monitors the overall percentage of trained personnel on a monthly basis, while the Executive Committee reviews accessibility training coverage across product lines every quarter.

2.7 Business Conduct (ESRS G1)

74Software's approach to business conduct is designed to maximise positive impacts, mitigate risks, and leverage opportunities across its value chain. The company recognises that a strong corporate culture, robust anti-corruption measures, and responsible supplier management are essential for long-term success, stakeholder trust, and regulatory compliance. This holistic approach enables 74Software to drive sustainability

and ethical standards beyond its immediate operations, reinforcing industry-wide responsibility and generating positive environmental and social impact. As stated in the Code of Ethics, 74Software is committed to environmental stewardship and social responsibility, ensuring these principles are embedded not only within the organisation but also throughout its network of partners and suppliers.

2.7.1 Business Conduct IROs (G1)

The identification of impacts, risks, and opportunities related to business conduct (ESRS G1) is based on the transversal process described in ESRS 2 IRO-1 in Section 2.1.4.1. This process spans the Group's full range of activities, geographical footprint, sector specific characteristics, and upstream and downstream value chain, in accordance with the requirements of ESRS.

IROs		Value Chain Location			Time Horizon		
		Upstream	Own operations	Downstream	Short term	Medium term	Long term
Corporate Culture	A socially responsible and ethical corporate culture enhances employee well-being and engagement, strengthens cohesion, and contributes to positive societal and environmental outcomes.		✓			✓	✓
Corporate Culture	A transparent and ethical corporate culture enhances trust, attracts top talent, fosters innovation, and supports sustainable growth.		✓		✓	✓	✓
Corruption and Bribery	Corruption and bribery can undermine social trust and the rule of law, divert resources from essential public services, and exacerbate inequality and harm to vulnerable communities.	✓	✓	✓		✓	✓
Corruption and Bribery	Corruption and bribery can result in legal penalties, financial losses, reputational damage, and loss of market access.	✓	✓	✓	✓	✓	✓
Protection of whistleblowers	Insufficient protection of whistleblowers can expose individuals to retaliation and stress, foster a culture of fear and silence, and discourage the reporting of unethical or illegal practices, negatively affecting the workplace environment and employee morale.		✓		✓	✓	
Protection of whistleblowers	Failure to protect whistleblowers can lead to legal and regulatory consequences, reputational damage, unresolved internal issues, financial losses, and loss of stakeholder trust.		✓		✓	✓	✓
Strategic Partners and Suppliers	Strategic partnerships and supplier relationships provide leverage to promote higher environmental and ethical standards throughout the ecosystem.	✓			✓	✓	✓
Strategic Partners and Suppliers	Economic risk due to loss of a strategic supplier (e.g. dependencies with Cloud service providers).	✓			✓	✓	✓

2.7.2 Business conduct policies and corporate culture (G1-1)

74Software's Code of Ethics sets out the principles and rules governing business conduct, anti-corruption, gifts and hospitality, conflicts of interest, data protection, intellectual property, fair competition, and whistleblowing. Endorsed by the Chairman of the Board and implemented by the Ethics Committee, the policy applies to all entities within the Group and, where relevant, to partners, suppliers, and other value chain actors. The Code and corporate culture policy have been developed through a process that actively considers the interests of key stakeholders: input is gathered from employees via regular surveys, all-hands meetings, and consultations with the workers' council; customer interests are incorporated through NPS surveys and direct meetings; and suppliers and partners are engaged during contract negotiations and ongoing collaboration. This multi-faceted approach ensures the policy is aligned not only with regulatory requirements and company values, but also with the expectations and needs of those most affected by its implementation. By integrating stakeholder feedback

at every stage, 74Software promotes a culture of transparency, fairness, and responsibility throughout its operations and value chain. Policies are published on the corporate website and intranet in clear, non-technical language to ensure accessibility and understanding. The effectiveness of the policy is monitored through annual governance reviews and periodic audits. Ethics training is mandatory for all employees, supported by a whistleblowing channel (74software.ethics.notification@74software.com), internal audit risk-mapping, and a Gifts & Invitations declaration workflow. The Anti-corruption and ethics policies are communicated to suppliers and partners through contractual clauses, onboarding sessions, and dedicated supplier portals. Alert Procedure ensures prompt investigation and remediation of any breaches. This procedure guarantees confidentiality and protection against retaliation for individuals reporting concerns in good faith, in line with EU and national legal requirements.

2.7.3 Management of relationships with suppliers (G1-2)

Supplier management at 74Software is governed by both the Supplier & Partner Charter and the Code of Ethics, which together establish standards for fair competition, transparency, confidentiality, intellectual property protection, payment terms, ESG criteria, and anti-corruption. The Supplier & Partner Charter has been formally validated by the CEO, Patrick Donovan. The Group Procurement Department is responsible for implementing these policies, which are accessible to all stakeholders and include a dedicated ethics contact for suppliers and partners (74software.ethics.notification@74software.com). This policy, or a negotiated equivalent, applies to all entities and strategic suppliers, including major cloud service providers.

74Software recognises the economic risks associated with strategic suppliers, particularly public cloud providers, and proactively addresses these risks by selecting alternative suppliers, defining contingency processes, and diversifying its vendor base. Business continuity is a key consideration: the Procurement Department ensures that contingency plans are in place to maintain operations in the event of supplier disruption, and regularly reviews and updates these plans as part of its risk management strategy. The Procurement Department also ensures rigorous contract management, compliance with contractual obligations, and monitoring of service level agreements (SLAs). ESG criteria are integrated into supplier selection to promote responsible sourcing.

The Supplier & Partner Charter and the Code of Ethics are currently being rolled out to all active suppliers. Supplier onboarding involves comprehensive due diligence, including KYC, export control, sanctions screening, and legal checks. Periodic supplier audits are conducted, with corrective action plans implemented in cases of non-compliance. Payment terms are closely monitored, and late payments are tracked. Additionally, 74Software is developing tools to strengthen the monitoring and effectiveness of its supplier management policies. By leveraging its influence, the company helps promote more sustainable practices within the cloud industry, contributing to the reduction of the overall environmental footprint of digital services.

In addition, as both a developer of digital solutions and a consumer of cloud infrastructure, 74Software plays an important role in shaping the environmental practices of its technology partners. Cloud services carry a significant environmental footprint due to the high energy consumption of data centers and the associated carbon emissions. By setting clear sustainability expectations, requesting greener alternatives, and encouraging the adoption of renewable energy sources or more energy-efficient technologies, 74Software can help enhance the environmental performance of its strategic partners and suppliers. This influence reinforces the Group's commitment to responsible sourcing and contributes to reducing the overall environmental impact of cloud services within its supply chain.

2.7.4 Prevention and detection of corruption and bribery (G1-3)

74Software enforces a zero-tolerance approach to corruption and bribery, anchored in its Code of Ethics, Gifts & Invitations Policy, and Alert Procedure. This framework ensures compliance with international standards and local regulations while safeguarding stakeholder trust. Feedback from employees, customers, and representative bodies is integrated into the design and continuous improvement of these measures. The Internal Audit Department updates the corruption risk map annually to identify and mitigate emerging risks, while the Ethics Committee conducts independent investigations, oversees the anti-corruption system, and reports outcomes to senior management, the Audit Committee, and the Board of Directors. Organisational procedures ensure constant oversight of expenses to prevent improper

advantage, and legal approvals for high-risk geographies, sanctions lists, and embargoes are managed through processes integrated into the Company's CRM tools. Mandatory anti-corruption training is provided to all employees, with enhanced focus on Finance and Sales, the only functions identified as high-risk. Training coverage, duration, delivery method, and frequency are systematically tracked. Effectiveness is monitored through key indicators, such as training completion rates, and the Company is assessing the introduction of formal performance targets to strengthen compliance. Through these measures, 74Software aligns with global best practices and reinforces its commitment to integrity, transparency, and accountability.

74Software has implemented mandatory anti-corruption training:

	2024	2025
Training coverage	261	244
Delivery method	Online training	Online training
Duration	Axway – 30 min/ SBS – 10 min	Axway – 25 min/ SBS – 26 min
Frequency – How often is the training required?	Once during onboarding	Once during onboarding

Total received training by function

	2024	2025
At-risk functions (Finance & Sales)	46	20
Managers	83	6
Executive committee	0	0
Other employees	178	218

2.7.5 Incidents of corruption or bribery (G1-4)

74Software is committed to upholding the highest standards of transparency and accountability in the reporting of incidents of corruption and bribery. The Company has implemented a comprehensive whistleblowing procedure, as set forth in its published policies, which enables any employee or external party to confidentially report, in good faith and without direct financial consideration, any suspected or actual breach of anti-corruption laws, ethical standards, or internal procedures. Reports are submitted directly to the Ethics Committee, which is responsible for conducting independent and objective investigations, thereby ensuring impartiality and the absence of conflicts of interest. The procedure guarantees strict confidentiality for both whistle-blowers and implicated individuals, in accordance with applicable legislation, and provides robust protection against any form of retaliation.

74Software's approach to the prevention and detection of corruption and bribery is multi-faceted and embedded within its Code of Ethics and supporting procedures.

Management at all levels is responsible for promoting awareness, implementing effective controls, and actively monitoring for potential risks, including corruption, influence peddling, and fraud. The Ethics Committee oversees the anti-corruption management system, provides guidance to employees, and reports on system performance to senior management and the Board of Directors. Any substantiated breach results in appropriate disciplinary action, up to and including dismissal, and may be reported to the relevant authorities. The Company's procedures are fully compliant with international standards, including ISO 37001:2016, as well as French legislation such as the Wasserman Act.

For the 2025 reporting period, no whistleblower alerts were received, whether or not they led to investigations and it has not been subject to any convictions or fines for anti-corruption or anti-bribery violations.

2.7.6 Political influence and lobbying activities (G1-5)

74Software does not participate in political influence or lobbying activities. The company adheres to a strict policy of neutrality in all political matters, maintaining its focus on core business operations and refraining from any attempts to influence political decisions or public policies.

2.7.7 Payment practices (G1-6)

74Software's procurement processes are designed to ensure strict adherence to the payment commitments and deadlines agreed in supplier contracts, in full compliance with applicable laws. Where payment terms are not explicitly defined by the supplier or specified in the contract, the company aims to process all invoices within 60 days, or within the equivalent local standard where applicable. 74Software does not have specific payment practices concerning small and medium enterprises (SMEs). Nevertheless, the Company maintains a high level of vigilance with respect to compliance with payment deadlines, which are closely monitored by the Finance Department. Furthermore, independently of payment considerations, a dedicated and enhanced validation procedure is implemented for individual suppliers.

For the 2025 financial year, the average payment period per invoice was 40 days, compared with 46 days in 2024. This period is calculated from the start date of the contractual or statutory payment term. The proportion of invoices paid beyond 60 days reduced to 10%, compared to 12% in the previous year. There are no outstanding legal proceedings related to late payments within the scope of 74Software's operations.

The table below presents the percentage of invoices paid within the contractual terms, without distinction by supplier category. These percentages reflect the proportion of payments made within the agreed timeframe, rather than indicating delays beyond the contractual terms.

	0 – 30 days	31 – 45 days	46 – 60 days	60+ days	Total
2024	44%	25%	18%	12%	100%
2025	47%	24%	19%	10%	100%

2.8 Report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852

This is a translation into English of the statutory auditors' report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852 of the Company issued in French and it is provided solely for the convenience of English-speaking users.

This report should be read in conjunction with, and construed in accordance with, French law and the H2A guidelines on "Limited assurance engagement – Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852".

Year ended 31 December 2025

To the General Meeting of 74Software,

This report is issued in our capacity as statutory auditors of 74Software. It covers the sustainability information and the information required by Article 8 of Regulation (EU) 2020/852, relating to the year ended 31 December 2025 and included in the Group management report and presented in Chapter 3, Sections 3.1 to 3.7, of the Universal Registration Document (hereinafter the "Sustainability Statement").

Our procedures covered this information and were performed in an evolving context marked by uncertainties regarding the interpretation of texts and the development of market practice.

Pursuant to Article L. 233-28-4 of the French Commercial Code (*code de commerce*), 74Software is required to include the above-mentioned information in a separate section of the Group management report.

This information enables an understanding of the impact of 74Software's activities on sustainability matters, as well as the way in which these matters influence the development of its business, performance and consolidated financial position. Sustainability matters include environmental, social and corporate governance matters.

Pursuant to Article L. 821-54 paragraph II of the aforementioned Code our responsibility is to carry out the procedures necessary to issue a conclusion, expressing limited assurance, on:

- compliance with the requirements resulting from the sustainability reporting standards adopted by the European Commission pursuant to Article 29b of Directive 2013/34/EU of the European Parliament and of the Council of June 26, 2013 as amended by Directive (EU) 2022/2464 of the European Parliament and of the Council of December 14, 2022 (hereinafter the European Sustainability Reporting Standards or ESRS) of the process implemented by 74Software to determine the information reported, including the obligation to consult the Social and Economic Committee provided for in the last paragraph of Article L. 2312-17 of the French Labor Code, where the entity is subject to this obligation;
- compliance of the sustainability information included in the Sustainability Statement with the requirements of Article L. 233-28-4 of the French Commercial Code, including ESRS; and
- compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852.

This engagement is carried out in compliance with the ethical rules, including independence, and quality control rules prescribed by the French Commercial Code.

It is also governed by the H2A (*Haute Autorité de l'Audit*) guidelines, "Limited assurance engagement - Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852".

In the three separate sections of the report that follow, we present, for each of the sections of our engagement, the nature of the procedures that we carried out, the conclusions that we drew from these procedures and, in support of these conclusions, the elements to which we paid particular attention and the procedures that we carried out with regard to these elements. We draw your attention to the fact that we do not express a conclusion on any of these elements taken individually and that the procedures described should be considered in the overall context of the formation of the conclusions issued in respect of each of the three sections of our engagement.

Finally, where deemed necessary to draw your attention to one or more disclosures of sustainability information provided by 74Software in the Sustainability Statement, we have included an emphasis of matter paragraph hereafter.

Limits of our engagement

As the purpose of our engagement is to express limited assurance, the nature (choice of control techniques), extent (scope) and timing of the procedures are less than those required to obtain reasonable assurance.

This engagement does not guarantee the viability or the quality of the management of 74Software, in particular it does not provide an assessment of the relevance of the choices made by 74Software in terms of action plans, targets, policies, scenario analyses and transition plans, beyond compliance with ESRS reporting requirements.

In addition, in the case of forward-looking information that is by nature uncertain, actual results may differ, sometimes materially, from the forecasts presented in the Sustainability Statement.

SUSTAINABILITY STATEMENT

Report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852

Our engagement does, however, allow us to express conclusions regarding the entity's process for determining the sustainability information to be reported, the sustainability information itself, and the information reported pursuant to Article 8 of Regulation (EU) 2020/852, as to the absence of identification or, on the contrary, the identification of errors, omissions or inconsistencies of such importance that they would be likely to influence the decisions that readers of the information subject to this engagement might make.

The sustainability information and the information required by Article 8 of Regulation (EU) 2020/852 may be subject to the uncertainty inherent to the state of scientific knowledge and the quality of external data used. Some information is sensitive to the choice of methodology and the assumptions and/or estimates used for its preparation and presented in the Group management report.

In addition, a report certifying the sustainability information within the meaning of Article L.821-54 of the French Commercial Code was not issued in respect of the 2023 comparative information.

Compliance with ESRS of the process implemented by 74Software to determine the information reported and compliance with the requirement to consult the Social and Economic Committee provided for in the last paragraph of Article L. 2312-17 of the French Labor Code

Nature of procedures carried out

Our procedures consisted in verifying that:

- the process defined and implemented by 74Software, including the obligation to consult the Social and Economic Committee pursuant to the last paragraph of Article L. 2312-17 of the French Labor Code, has enabled it, in accordance with ESRS, to identify and assess its impacts, risks and opportunities related to sustainability matters, and to identify the material impacts, risks and opportunities that are disclosed in the Sustainability Statement, and
- the information provided on this process also complies with ESRS.

Conclusions of the procedures carried out

Based on the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies regarding the compliance of the process implemented by 74Software with ESRS.

Elements that received particular attention

We present below the elements that received our particular attention concerning the compliance with ESRS of the process implemented by 74Software to determine the information reported.

Information on how 74Software updated its double materiality analysis is disclosed in Section 3.1.4.1 "Identification of the IROs and Double Materiality Analysis (ESRS2 IRO-1)" of the Sustainability Statement.

Through interviews with Management and the individuals we considered appropriate, and by inspecting the available documentation, we obtained an understanding of:

- the analyses carried out by 74Software to identify and assess the internal and external factors that led to the update of the double materiality analysis process. These include, in particular, the consideration of the Group's full scope in 2025;
- changes made, compared to the previous year, to the list of material impacts, risks and opportunities ("IRO") determined by 74Software.

Based on our professional judgement, our procedures notably consisted of:

- exercising professional scepticism regarding the documentation of analyses carried out by the entity and the approach implemented by it to identify the internal and external factors to be considered;
- assessing the appropriateness of the internal and external factors considered by 74Software in light of our knowledge of the group;
- assessing the relevance of the material changes made by 74Software to the assessment of the actual and potential impacts, risks and opportunities identified in light of our knowledge of the entity and available sector-based analyses and competitive benchmarks that we considered relevant;
- assessing, for the material changes affecting the actual and potential impacts, risks and opportunities, the compliance of the impact and financial materiality assessment process implemented by the company with the criteria defined in ESRS 1;
- assessing the appropriateness of the description provided in this respect in Section 3.1.4.1 "Identification of the IROs and Double Materiality Analysis (ESRS2 IRO-1)" of the Sustainability Statement.

Compliance of the sustainability information included in the Sustainability Statement with the requirements of Article L. 233-28-4 of the French Commercial Code, including ESRS

Nature of procedures carried out

Our procedures consisted in verifying that, in accordance with legal and regulatory requirements, including ESRS:

- the disclosures provided enable an understanding of the general basis for the preparation and governance of the sustainability information included in the Sustainability Statement, including the basis for determining the information concerning the value chain and the exemptions from disclosures used;
- the presentation of this information ensures its readability and understandability;
- the scope chosen by 74Software for providing this information is appropriate; and
- on the basis of a selection, based on our analysis of the risks of non-compliance of the information provided and the expectations of users, that this information does not contain any material errors, omissions or inconsistencies, i.e. that are likely to influence the judgement or decisions of users of this information.

Conclusions of the procedures carried out

Based on the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies regarding the compliance of the sustainability information included in the Sustainability Statement with the provisions of Article L. 233-28-4 of the French Commercial Code, including ESRS.

Emphasis of matter

Without qualifying the conclusion expressed above, we draw your attention to:

- the change in the consolidated scope of the Group with the integration of SBS Software on 2 September 2024, as a result of which the data published in 2024 is not comparable for item 3.11 of the carbon assessment (excluding SBS Software in 2024), the taxonomy (excluding SBS Software in 2024) and waste-related data, as disclosed in Section 3.1.1.2;
- the information presented in the summary methodology note in section 3.2.7, and the detailed methodology note at the end of the environmental chapter of the Sustainability Statement, which describe the methods used, including in particular the estimates and adjustments, to determine the Group's greenhouse gas emissions assessment and to calculate the carbon intensity indicator;
- the information presented in Section 3.5.16.2 "Annual total remuneration ratio" of the Sustainability Statement describing the methodology principles followed by the entity to calculate the total remuneration ratio.

Elements that received particular attention

Information provided in application of environmental standard (ESRS E1)

Information reported in respect of climate change is disclosed in Section 3.2. of the Sustainability Statement.

We present below the elements that received our particular attention regarding the compliance of this information with ESRS.

Our procedures mainly consisted in assessing the appropriateness of the information presented in the environmental section of the sustainability information included in the Sustainability Statement and its overall consistency with our knowledge of the entity.

Based on interviews conducted with the individual concerned, we assessed whether the description of the policies, actions and targets implemented by the entity covers climate change mitigation. With regard to the information published as part of the greenhouse gas emissions assessment:

- We familiarised ourselves with the internal control and risk management procedures implemented by the entity to ensure the compliance of the information published;
- We assessed the consistency of the scope considered to assess greenhouse gas emissions with the scope of the consolidated financial statements, the activities under operational control, and the upstream and downstream value chain;
- We familiarised ourselves with the greenhouse gas emissions inventory protocol used by the entity to establish the greenhouse gas emissions assessment and reviewed its application, for a selection of emission categories and sites, for scope 1 and scope 2.
- With regard to scope 3 emission, we assessed:
 - the justification for the inclusion or exclusion of the different categories and the transparency of the information provided in this respect,
 - the information gathering process.
- We assessed the appropriateness of the emission factors used and the calculation of the related conversions as well as the calculation and extrapolation assumptions, taking into account the uncertainty inherent to the state of scientific or economic knowledge and the quality of the external data used;
- We met with management to understand the key business changes that occurred during the fiscal year that could impact the greenhouse gas emissions assessment;
- For physical data (such as energy consumption), we reconciled, on a sample basis, the underlying data used to compile the greenhouse gas emissions assessment with the supporting documents;
- We implemented analytical procedures;

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- For the estimates we considered significant used by the entity to prepare its greenhouse gas emissions assessment:
 - We familiarised ourselves with the methodology for calculating the estimated data and the information sources underlying these estimates through discussions;
 - We assessed whether the methods were applied consistently or whether there were any changes since the previous period, and if these changes were appropriate;
- We verified the arithmetic accuracy of the calculations used to establish this information;
- We assessed the appropriateness of the disclosures in the methodology notes (summary note in Section 3.2.7 and detailed note at the end of the environmental chapter of the Sustainability Statement).

Information provided in application of social standards (ESRS S1)

The information published in respect of Group employees (ESRS S1) is presented in Chapter 3, Section 3.5, of the Universal Registration Document.

Through discussions with management on the analysis of human resources data, we:

- familiarised ourselves with the collection and compilation procedure for processing qualitative and quantitative information with a view to publishing material information in the Sustainability Statement,
- reviewed the available underlying documentation;
- implemented procedures to verify the proper consolidation of this data;
- familiarised ourselves with the internal control and risk management procedures implemented by the Group, it being specified that we did not test the design and operational effectiveness of these controls.

Based on information selected on a sample basis, we:

- reviewed the geographic and legal scope on which the information was established;
- assessed whether the methods and assumptions used by the entity to determine the disclosed information were appropriate for ESRS S1;
- defined and implemented analytical procedures adapted to the information examined in connection with changes in activity;
- examined, on a sample basis, the supporting documents with the relevant information,
- verified the arithmetic accuracy of the calculations underlying the information, where applicable after application of rounding.

Lastly, we assessed the appropriateness of the information presented in Section 3.5 of the Sustainability Statement and its overall consistency with our knowledge of the Group.

Compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852

Nature of procedures carried out

Our procedures consisted in verifying the process implemented by 74Software to determine the eligible and aligned nature of the activities of the entities included in the consolidation.

They also involved verifying the information reported pursuant to Article 8 of Regulation (EU) 2020/852, which involved checking:

- compliance with the rules applicable to the presentation of this information to ensure that it is readable and understandable;
- on a sample basis, the absence of material errors, omissions or inconsistencies in the information provided, i.e. information likely to influence the judgement or decisions of users of this information.

Conclusions of the procedures carried out

Based on the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies relating to compliance with the requirements of Article 8 of Regulation (EU) 2020/852.

Elements that received particular attention

The information published in respect of the European Taxonomy is presented in Chapter 3, Section 3.4, of the Universal Registration Document. We present below the elements that received our particular attention regarding the compliance of this information with regulations (EU 2020/852).

Concerning the eligibility of activities

We assessed, through discussions and inspection of the related documentation, the compliance of the entity's analysis of activities that it determined to be ineligible with the criteria set out in the Annexes to the delegated acts supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council.

Regarding key performance indicators and related information

For the revenue, CapEx and OpEx totals (the denominators) presented in the regulatory tables, we verified the reconciliations performed by the entity with accounting data used to prepare the financial statements and/or data linked to the accounting books and records such as the management and cost accounting system.

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In particular, we:

- assessed the choices made by the entity with respect to taking into account European Commission communications on the interpretation and implementation of certain provisions of the Taxonomy Regulation;
- consulted, on a sample basis, the documentary sources used;
- analysed, on a sample basis, the items underlying the entity's assessment of whether eligible CapEx and OpEx met the cumulative conditions in the Taxonomy required to be considered aligned, in particular the "do no significant harm" principle with respect to the other environmental objectives;
- assessed the analysis performed relating to compliance with minimum safeguards, primarily in light of the information collected to gain an understanding of the entity and its environment.

With regard to the other amounts comprising the various indicators of eligible and/or aligned activities (the numerators), we:

- implemented analytical procedures;
- assessed these amounts based on a selection of representative transactions, which we determined according to their contribution to the indicators.

Lastly, we assessed the consistency of the information presented in Section 3.4 of the Group management report with the other sustainability-related information in this report.

The Statutory Auditors

Levallois-Perret and Paris, 24 March 2026

Forvis Mazars SA
Jérôme Neyret
Partner

Aca Nexia
Sandrine Gimat
Partner

Sustainability Statement cross-reference table

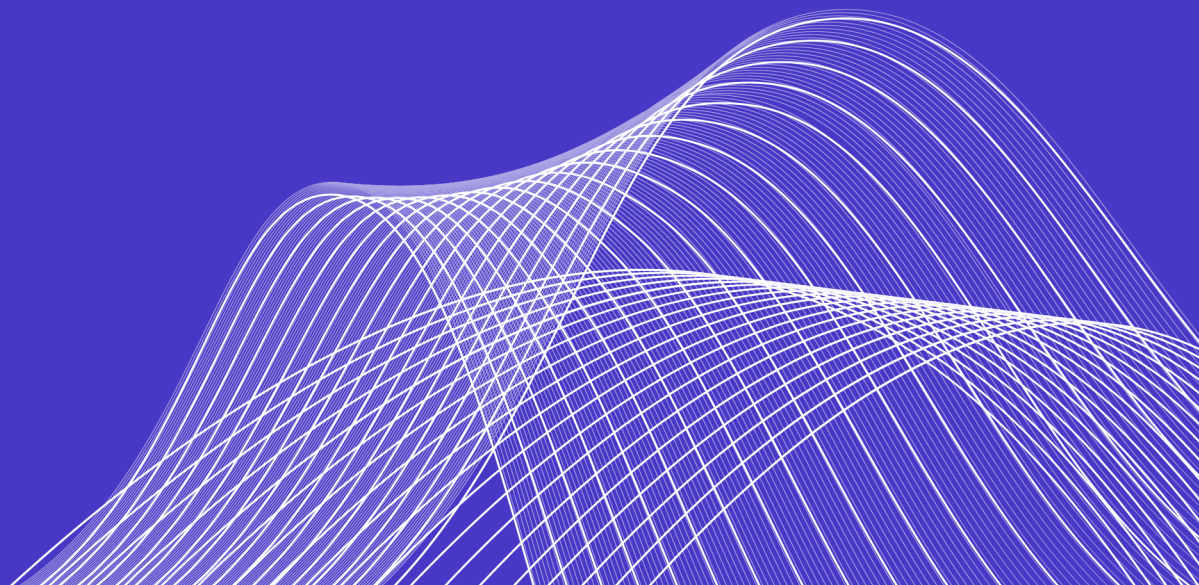
Themes	Chapter	Page
Mandatory issues referred to in Article L. 225-102-1		
Social impacts of the activity	2.5	64
Measures to combat discrimination and promote diversity	2.5.2.7	69
Measures taken in favour of people with disabilities	2.6.6	112
Collective agreements signed in the Company and their impacts on the Company's economic performance and employee working conditions	2.5.9	93
Environmental impacts of the activity	2.2 - 2.3	41-56
Impacts of the Company's activity and the use of the goods and services it produces on climate change	2.2.1	41
Direct and indirect greenhouse gas emission items relating to upstream and downstream transport activities ⁽¹⁾	N/A	N/A
Societal commitments in favour of the circular economy	2.3	52
Societal commitments in favour of sustainable development	2.1.2	23
Respect for human rights	2.5.2.5	68
Fight against corruption	2.7.3	116
Fight against tax evasion	URD	URD
Societal commitments to combat food waste ⁽¹⁾	N/A	N/A
Societal commitments to combat food insecurity ⁽¹⁾	N/A	N/A
Societal commitments on the respect for animal welfare ⁽¹⁾	N/A	N/A
Societal commitments for responsible, fair and sustainable food ⁽¹⁾	N/A	N/A
Measures to promote the relationship between the nation and the army and to support commitment to the reserves ⁽¹⁾	N/A	N/A
Measures to promote physical and sporting activities ⁽¹⁾	N/A	N/A

(1) These issues were excluded from the analysis scope as considered too remote from 74Software's activities.

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74Software is home for leading brands with mission-critical enterprise applications and infrastructure software serving a growing range of markets and geographies – each with their own identities and value propositions.

FRANCE

Tour Trinity
1 bis Place de La Défense
92400 Courbevoie - France
Tel. +33 (0) 1.47.17.24.24

USA

16220 N Scottsdale Road,
Suite 500
Scottsdale, AZ 85254
Tel: +1.480.627.1800

 WWW.74SOFTWARE.COM