Buchberger Ettmayer
Rechtsanwälte GmbH

Porzellangasse 51
1090 Vienna

T +43 1 31 03 256
F +43 1 31 03 256 4850
office@kpmg-law.at

Thomas Androsch, LL.M.
Mag. Stefan Arnold, MJur
Dr. Franz Josef Arztmann, MBA
Dr. Dieter Buchberger, LL.M. Eur.
Mag. Mario Burger
Mag. Pablo Essenther, LL.M., B.Sc.
Dr. Wendelin Ettmayer, LL.M.
Mag. Stefanie Heimel
Alexander Hiermann, LL.M. (WU)
Lisa-Maria Jobst, LL.M. (WU)
Dr. Vanessa McAllister, LLM.oec.
Mag. Paul Moosmann
Dr. Stefan Niederstrasser
Dr. Marie Sophie Reitinger
Mag. Stephanie Sauer
Mag. Elisabeth Wasinger, LL.M.
Mag. Isabella Wiener
Mag. Armin Zarghami, LL.M.

TRANSLATION

AUSTRIACARD HOLDINGS AG
Management board
Lamezanstraße 4-8
1230 Vienna

Contact: Mag. Stefan Arnold, MJur
Email: stefanarnold@kpmg-law.at

Vienna, this 30 June 2026

External evaluation of compliance with corporate governance in the financial year 2025

Dear Members of the Management Board,

AUSTRIACARD HOLDINGS AG (the "**Company**") has engaged KPMG Law – Buchberger Ettmayer Rechtsanwälte GmbH to conduct an external evaluation of the Company's compliance with the Austrian Corporate Governance Code (ÖCGK) for the financial year 2025 in accordance with C-Rule 62 of the ÖCGK (the "**Evaluation**"). In accordance with C-Rule 62 of the ÖCGK, the evaluation covers compliance with the C-Rules of the ÖCGK, but not with the L-Rules or the R-Rules of the ÖCGK.

The Evaluation was conducted exclusively on the basis of the questionnaire for the voluntary external evaluation of compliance with the Austrian Corporate Governance Code, as published by the Austrian Working Group for Corporate Governance in the January 2025 version. The Evaluation was carried out based on the information provided by the Company and a selective review of the documents made available by the Company, and this report was prepared accordingly. The Evaluation and this report relate to the financial year 2025, as well as to information and events that were available prior to the preparation of this report and pertain to the financial year 2025.

This external evaluation in accordance with C-Rule 62 of the ÖCGK is not an audit, a review, or an audit-like procedure. No audit is conducted in accordance with the principles applicable to an audit or review of financial statements. With regard to all documents provided to us by the Company for the purpose of conducting the Evaluation, we assume that they are accurate and complete and, in the case of copies, consistent with the genuine originals. With regard to all information provided in writing or orally, we assume that it was accurate and complete.

This report is intended solely to assist the Company in demonstrating that the external evaluation pursuant to C-Rule 62 was conducted. This report is addressed solely to the Company; third parties may therefore not derive any rights from this report or the evaluation results presented herein. This report is not to be construed as investment advice or an investment recommendation and may not serve as the basis for investment decisions or decisions regarding the conclusion of legal transactions with the Company. Any liability toward third parties is excluded.

The evaluation has shown that – except for the deviations listed below – the Company complied with the C-Rules of the ÖCGK in the financial year 2025 (1 January 2025 through 31 December 2025) or has properly explained any deviations from the ÖCGK's C-Rules in the Corporate Governance Report for the financial year 2025.

As part of the Evaluation, the following deviations from the ÖCGK were identified, for which the Corporate Governance Report for the financial year 2025 does not contain any explanations in accordance with L-Rule 60 of the ÖCGK:

1. C-Rule 28: The Company's Share Option Program 2023, which expired on 31 December 2025, did not require the holding of an appropriate number of shares in the Company for the duration of the program.

2. C- Rule 38c: Mr Mohamed Chemloul was appointed to the Company's Management Board for the first time for a term ending on 30 June 2027, in order to align the terms of office of all members of the Management Board. His initial appointment was therefore not for a term of at least three years.

3. C-Rule 61: The management report for financial year 2025 does not specify the website on which the corporate governance report for financial year 2025 will be published.

Sincerely,

Buchberger Ettmayer Rechtsanwälte GmbH