2 November 2026

The Smarter Web Company PLC
("The Smarter Web Company" or the "Company")

Bitcoin Custody Arrangements

The Smarter Web Company PLC provides the following update regarding its Bitcoin custody arrangements, in light of recent reports on security incidents within the digital asset sector.

The Company recognises the significant contribution Binance has made to the development and adoption of the digital asset industry. We are encouraged by Binance's proactive response to recent events and its stated commitment to protecting affected customers, supported by its financial resources. For clarity, the Company **does not hold any of its Bitcoin with Binance**, with its holdings instead maintained across its established institutional custody providers.

The Company's Bitcoin holdings are held through established, institutional-grade custody providers, with Bitcoin currently held across **Coinbase, Fidelity and Anchorage Digital**.

The Company's custody strategy has been deliberately structured to prioritise the security and protection of its Bitcoin holdings, while reducing reliance on any single provider.

Key features of these arrangements include:

- **Diversification:** Bitcoin is held across multiple institutional custodians operating in different regulatory jurisdictions, reducing concentration and counterparty risk.
- **Asset protection:** Custody arrangements incorporate contractual and legal protections designed to segregate the Company's Bitcoin holdings from the custodians' own assets, with protections varying by provider.
- **Insurance arrangements:** The Company's institutional custody arrangements incorporate insurance-related protections, with certain custodians contractually required to maintain insurance and others confirming that they maintain insurance against specified risks, including certain cyber incidents and theft. The nature, scope and availability of insurance coverage vary between providers and are subject to the terms, conditions, limits and exclusions of the relevant policies. The Company considers these arrangements to provide an additional layer of risk mitigation alongside its diversified custody structure, contractual asset protections and internal security controls.
- **Institutional security:** Private keys are managed by the respective custodians, which operate institutional security controls.

- **Internal controls:** Significant transactions are subject to multi-person authorisation within the Company, ensuring that no single individual can independently initiate and approve such transactions.
- **Operational flexibility:** The Company retains the ability to transfer Bitcoin between its custody providers, allowing it to respond to changing circumstances and manage counterparty exposure.

The Company's approach to Bitcoin custody is based on multiple complementary layers of protection, including the use of established institutional custodians, diversification across providers and jurisdictions, contractual and legal asset protections, institutional private-key security, internal transaction authorisation controls and insurance arrangements maintained by its custodians. The Board believes that this combination provides a robust framework for managing custody and counterparty risk, recognising that no individual measure can eliminate all potential risks associated with holding Bitcoin.

Andrew Webley, Chief Executive Officer of The Smarter Web Company, commented:

"We have taken a deliberate and considered approach to how we safeguard our Bitcoin holdings, recognising that the strength of our custody arrangements is just as important as the scale of our treasury.

"By establishing relationships with multiple leading institutional custodians, we have built a diversified custody framework designed to provide strong asset protection, operational resilience and flexibility as our Bitcoin treasury continues to develop.

"We believe this approach provides a strong foundation for the long-term execution of our Bitcoin treasury strategy and reflects our commitment to building a credible and enduring institutional Bitcoin treasury company."

Enquiries

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About The Smarter Web Company

The Company owns and operates digital services businesses focused on web design, development and digital marketing. The Company serves more than 500 client websites

across a diverse range of sectors and generates a significant and growing proportion of its revenue through long-term client relationships and retained service arrangements.

The Company's strategy combines the operation and acquisition of cash-generative businesses with a Bitcoin treasury policy designed to build long-term Shareholder value (the "Bitcoin Treasury Policy"). The Directors believe that Bitcoin will form a significant part of the future global financial system and have therefore adopted this Bitcoin Treasury Policy under which Bitcoin is the Company's primary treasury reserve asset.

The primary objectives of the Bitcoin Treasury Policy are to support the Company's overall capital position and to seek to increase Bitcoin per Ordinary Share over time, with a secondary objective of increasing the total number of Bitcoin held on the Company's balance sheet. The Directors believe that growing Bitcoin per share while simultaneously increasing the scale of the Company's Bitcoin holdings creates a stronger balance sheet and supports the Company as a whole in providing a more attractive investment proposition for existing and prospective Shareholders.

As the strength of the balance sheet increases, the Company believes it can access larger pools of capital on favourable terms, provided such capital raising activity remains accretive to Bitcoin per Ordinary Share. This creates a cycle in which capital can be deployed to pursue strategic acquisitions and acquire additional Bitcoin that strengthen the Company's operating businesses, increase revenues and cash generation, and further enhance the overall strength of the Company.

The Ordinary Shares are admitted to listing on the equity shares (commercial companies) category of the Official List and to trading on the Main Market of the London Stock Exchange under the ticker SWC and are quoted on the OTCQB Venture Market in the U.S. under the ticker TSWCF. The Ordinary Shares can also be traded on the Frankfurt Stock Exchange under the ticker 3M8.

The Preferred Shares are admitted to listing on the non-equity shares and non-voting equity shares category of the Official List and to trading on the Main Market of the London Stock Exchange under the ticker MORE.

Please also see "The 10 Year Plan", announced by the Company via a regulatory information service at 7.00 a.m. on 28 April 2025 and available on the Company's website: https://www.smarterwebcompany.co.uk

Follow the Company on X: https://x.com/smarterwebuk

The Smarter Web Company's Legal Entity Identifier (LEI) is 213800VQO9FUG4PZMP73.

The Directors of the Company accept responsibility for the contents of this announcement.

Important Notice

The Smarter Web Company PLC holds treasury reserves and surplus cash in Bitcoin. Bitcoin is a type of cryptocurrency or cryptoasset. Whilst the Board of Directors of the Company considers holding Bitcoin to be in the best interests of the Company, the Board remains aware that the financial regulator in the UK (the Financial Conduct Authority or FCA) considers investment in Bitcoin to be high risk. An investment in the Company is not an investment in Bitcoin, either directly or by proxy. However, the Board of Directors of the Company considers Bitcoin to be an appropriate store of value and growth for the Company's reserves and, accordingly, the Company is materially exposed to Bitcoin. Such an approach is innovative,

and the Board of Directors of the Company wishes to be clear and transparent with prospective and actual investors in the Company on the Company's position in this regard.

The Company is neither authorised nor regulated in the conduct of its business by the FCA, and there is currently limited regulation of cryptocurrencies (such as Bitcoin) in the UK. As with most other investments, the value of Bitcoin can go down as well as up, and therefore the value of the Company's Bitcoin holdings can fluctuate. The Company may not be able to realise its Bitcoin exposure for the same as it paid in the first place or even for the value the Company ascribes to its Bitcoin positions due to these market movements. An investment in the Company is not protected by the UK's Financial Ombudsman Service or the Financial Services Compensation Scheme.

Nevertheless, the Board of Directors of the Company has taken the decision to invest in Bitcoin, and in doing so is mindful of the special risks Bitcoin presents to the Company's financial position. These risks include (but are not limited to): (i) the value of Bitcoin can be highly volatile, with value dropping as quickly as it can rise. Investors in Bitcoin must be prepared to lose all money invested in Bitcoin; (ii) the Bitcoin market is largely unregulated. There is a risk of losing money due to risks such as cyber-attacks, financial crime and counterparty failure; (iii) the Company may not be able to buy or sell its Bitcoin at will. The ability to buy or sell Bitcoin depends on various factors, including the supply and demand in the market at the relevant time. Operational failings such as technology outages, cyber-attacks and comingling of funds could cause unwanted delay; and (iv) cryptoassets are characterised in some quarters by high degrees of fraud, money laundering and financial crime. In addition, there is a perception in some quarters that cyber-attacks are prominent, which can lead to theft of holdings or ransom demands. The Board of Directors of the Company does not subscribe to such a negative view, especially in relation to Bitcoin. However, prospective investors in the Company are encouraged to do their own research before investing.