

English Translation

Application for Conciliation — Claim for CHF 68,000,000

WEINMANN ZIMMERLI Attorneys-at-Law

By registered mail

Conciliation Authority of Waldenburg Lampenbergerstrasse 10a 4435 Niederdorf
Switzerland

Place, Date: Zurich, 8 October 2026 Your Reference: — Our Reference: 5134/CWFN

Contact: Conrad Weinmann c.weinmann@weinmann-zimmerli.ch

APPLICATION FOR CONCILIATION

Dear Sir or Madam,

In the name and on behalf of

Corinth Management Services AG, Hofmattstrasse 14, 4431 Bennwil,

Claimant,

represented by the undersigned attorney-at-law, Dr. Conrad Weinmann, Weinmann
Zimmerli, Carmenstrasse 28, P.O. Box, 8032 Zurich,

against

1. Hal-Capital Limited, England and Wales Company No. 15926890, Soundwell Road,
Staple Hill, Bristol, United Kingdom, BS16 4QG;

2. James William Hansen (“Will”) O’Sullivan, permanently residing in the Netherlands,
with official postal address at 405 Sussex St., Haymarket, NSW 2000, Australia (also
contactable at will@analyticsolutions.com.au);

3. Chris Fry, The Annex, Great House Farm, East Orchard, Dorset SP7 0LQ, United
Kingdom,

Defendants.

I hereby submit an application for the conduct of conciliation proceedings, with the
following:

RELIEF SOUGHT

1. The Defendants shall be ordered to pay the Claimant the amount of CHF 68,000,000,
together with interest at 5% from 8 October 2026, with the Defendants being jointly and
severally liable for the entire amount.

2. In the alternative, Defendants 2 and 3 shall be ordered to pay the Claimant the amount of CHF 68,000,000, together with interest at 5% from 8 October 2026, with joint and several liability for the entire amount.

3. The Defendants shall bear the costs of the proceedings and pay compensation for legal expenses, plus VAT, with joint and several liability for the entire amount.

GROUND

1. The Claimant advises and assists, among others, other companies in the financing and implementation of new, often highly innovative projects. It operates internationally.

2. Defendant 1, for which Defendant 3 acts as a director, and Defendant 2, who engage, among other things, in intermediary activities for third-party companies, commenced a business relationship with the Claimant approximately two years ago.

This resulted in various projects involving third parties who, through the intermediary activities of Defendant 1, entered into business contact with the Claimant and, in many cases, concluded one or more agreements with it.

3. When the Claimant, following the relevant due diligence examinations or because of subsequent difficulties, did not simply approve or secure financing for every project initially under consideration — it should be emphasised that all such projects involved considerable business risks, even though several excessively risky projects had already been excluded by the Claimant at the outset — disagreements arose between the Claimant and the Defendants.

The Defendants wanted as many projects as possible to be implemented because they would have benefited financially from them.

Unlike the Claimant, however, they would not have had to assume any risk. Consequently, they stood only to gain and not to lose.

By contrast, the Claimant was required to weigh the opportunities and risks carefully. It also had to take into account the changing global situation and events such as the tariff increases imposed by the Trump administration, the war in Ukraine and the war involving Iran.

However, apparently because the Defendants depended on additional income, they were unwilling to accept either the rejection of a project or even its temporary suspension and the undertaking of further investigations.

This was despite the fact that, if any contractual relationship with the Claimant existed at all, it was only the relevant third parties who had such agreements. Moreover, those agreements always expressly reserved the possibility of such suspensions or additional examinations.

4. When the Defendants realised that the Claimant's conduct was lawful and that the third parties would not have been able to pursue successful legal proceedings — while the Defendants themselves had no contractual entitlement in any event — they attempted to put pressure on the Claimant.

Because reputation is the most important asset of a provider operating in this international business, they sought to attack the Claimant precisely in this area. These actions are being pursued in separate civil and criminal proceedings.

They disseminated false information through direct contact with project owners or interested parties and published AI-generated websites containing misinformation.

The use of artificial intelligence is readily apparent, for example, from the fact that certain activities were attributed to persons who were already deceased, or that completely unrelated individuals associated with similarly large monetary amounts were automatically linked to the Claimant, even though the Claimant did not know, and had never known, those individuals.

At least Defendant 2 did not refrain from making insulting statements or publishing private information, including employees' residential addresses, personal photographs and even a passport on the internet.

Through Defendant 2, the Defendants subsequently demanded substantial sums from the Claimant, amounting to several hundred thousand Swiss francs, to which they had no contractual entitlement.

In return, they offered to remove the posts or websites containing the false information. These matters are likewise being pursued in separate civil and criminal proceedings.

Because the Claimant refused to submit to these attempts at pressure, the Defendants intensified their activities.

More and more websites containing false information appeared, some of which were extremely difficult to remove, for example because their servers were located in Russia.

Following extensive investigations conducted by the Claimant, it has been established that the Defendants were responsible for the misinformation, acts of unfair competition and violations of personality rights.

The Defendants also implicitly acknowledged their responsibility by offering to remove the objectionable websites in exchange for payment of a substantial amount.

5. As a result of the Defendants' actions, the Claimant lost numerous projects.

All third parties who withdrew cited the misleading information disseminated by the Defendants.

Accordingly, the Defendants are liable for the damage thereby caused pursuant to Articles 41 et seq. of the Swiss Code of Obligations (CO).

In principle, they are jointly and severally liable pursuant to Article 50 paragraph 1 CO.

6. As a result of the Defendants' actions, the Claimant has suffered a loss of net income amounting to several hundred million Swiss francs.

Taking into consideration that most of these amounts would only have become due in the future, and multiplying the discounted total by the average success rate of the projects, the resulting damage amounts to slightly more than CHF 68,000,000, plus interest, for which the Defendants are liable.

7. Since the damage occurred in Switzerland and the Claimant has its registered office in Bennwil, the Swiss courts have territorial jurisdiction pursuant to Article 129, second sentence, in conjunction with Articles 2 and 33 paragraph 2 of the Swiss Federal Act on Private International Law (PILA).

Swiss law is applicable pursuant to Article 133 paragraph 2, second sentence, Article 136 paragraph 1, Article 137 paragraph 1, and Article 139 paragraphs 1(a) and 3 PILA.

Defendants 1 and 3 have their registered office, domicile or permanent residence in the United Kingdom.

Defendant 2 resides permanently in the Netherlands, as confirmed by his internet communications and LinkedIn profile, but at an unknown address, possibly because of difficulties with the Dutch immigration authorities.

He nevertheless continues to maintain an official postal address at his former residence, which is also his parents' home and the postal address of his company, Analytic Solutions Australia Pty Ltd.

The registered office of that company, however, is located in Hawthorn East, Victoria 3123, Australia, while its actual principal place of business is in Sydney.

8. The Defendants are aware of all the factual circumstances.

Nevertheless, the Claimant will explain these circumstances in greater detail at the conciliation hearing and submit documentary evidence in support of each individual point.

In particular, the Claimant will present a detailed chronology of the various instances of misinformation and the different misleading websites, supported by evidence.

It will also present evidence establishing that the Defendants were responsible for these activities.

Finally, the Claimant will explain in detail the circumstances giving rise to the damage and the calculation of the amount claimed.

The power of attorney will be submitted no later than the conciliation hearing.

Yours sincerely,

Dr. Conrad Weinmann Attorney-at-Law Weinmann Zimmerli

Signed

In duplicate