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Diversity Policy Applied in the Comarch Group

The Comarch Group consists of 60 companies located in over 30 countries around the world, most of the sales revenue come from foreign markets, Comarch is currently an international company with Polish roots. Entering new markets and functioning efficiently in them requires knowledge of local law and customs, respect for the culture and identity of local communities. It would not be possible without employing citizens of the countries in which the companies of the Comarch Group operate. Employment in foreign Comarch companies is approx. 9% of the total employment in the Comarch Group. Comarch provides employment opportunities to representatives of the local community in every location where it operates. Compliant with the Working Rules for Employees, employer is obliged to: "counteract discrimination in employment, in particular in relation to gender, age, disability, race, religion, nationality, political beliefs, union affiliation, ethnic origin, creed, sexual orientation."

Moreover, employees of Comarch Group companies "should be treated equally within the scope of beginning and terminating work, employment conditions, promotion and trainings availability in order to improve professional qualification, in particular regardless of gender, age, disability, race, religion, nationality, political beliefs, union affiliation, ethnic origin, creed, sexual orientation, and regardless whether employed definite or indefinite time, full-time or part-time."

Comarch's policy does not create any barriers in relation to gender, views, sexual orientation, ethnic or race origin within the scope of employing and personal policy. It does not contribute to direct or indirect discrimination due to gender, age, disability, race, religion, nationality, politic beliefs, union affiliation, ethnic origin, creed or sexual orientation.

The Comarch Group makes every effort to ensure balanced share of women and men in performing functions of management and supervisory boards' members in companies.

Representatives of the management bodies of the Comarch Group companies are citizens of different countries. The supervisory boards of Comarch Group companies include 11 women and 38 men. The management boards of the Comarch Group companies include mainly men (130 against 22 women), which is primarily related to the nature of the Comarch Group's operations and the specifics of the IT industry, in which men form a significant majority. It should also be emphasized that a large part of the management board members are people associated with Comarch for many years, possessing extensive knowledge in the field of IT technology and qualifications necessary for the positions held.

The Comarch Group constantly increases the percentage share of women's employment, however, when deciding about 31.4% of employees employed by the Comarch Group companies and about 27.5% of the management staff of the Comarch Group companies, which is a high proportion of women in total employment, especially taking into account the technical nature of the Comarch Group's operations.

Compliance and Internal Audit Department

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The Comarch age structure is very diverse. Comarch employs a lot of people under 30, which is typical for the IT industry. Persons in managerial positions are usually in the 30-50 age group, which also characterizes the management boards. In the case of supervisory boards, the 30-50 and over 50 age groups are represented by a similar number of people.

Supporting diversity and equality

Comarch's diversity policy does not place any barriers due to gender, views, sexual orientation, racial or ethnic origin in the field of employment and HR policy, does not contribute to direct or indirect discrimination, based on gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, denomination or sexual orientation.

The ratio of the average basic salary of women to the average basic salary of men by employee category in 2022 was as follows.

	Comarch S.A.	Comarch Grooup
categories	2022	2022
administration	91%	91%
managerial	67%	69%
production	76%	77%
other	73%	75%

Average remuneration of women in Comarch S.A. and in the Comarch Group is lower than the average remuneration of men. This is mainly due to the fact that employed women have shorter experience in the IT industry and shorter seniority in the Comarch Group, which affects the level of remuneration. However, this difference is decreasing year by year, and in the group of employees where experience in the industry and length of service are similar for women and men (administration), the level of earnings is equal.