

SUPPLIER SUSTAINABILITY POLICY

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Public

Comarch referred to as Comarch S.A. and entities of the Comarch Capital Group is a software house company and a system integrator. Since 1993 we thoroughly help our clients around the world in achieving greater profitability and reaping profits from modern products and solutions, using a wide range of tools supplemented by the highest quality services provided by skilled employees. Comarch has gained an experience in key sectors (telecommunication, finance, banking and insurance, trade and services, IT infrastructure, public administration, health, small and medium enterprises) due to projects carried out for the biggest Polish and international brands. We realize that the success of these projects depends both on us as well as on our Business Partners.

Comarch hereby commits to care about sustainability procurement, particularly by:

- supporting and encouraging our Clients and suppliers to responsibly treat their activities, especially those related to ethical, social and environmental practices,
- providing high quality IT products and services to our business clients on international market, while at the same time paying close attention to the security of information assets, aspects of the natural environment and the occupational safety of employees,
- building good partnership with suppliers, based on mutual cooperation, trust and fairness,
- conducting procurement activities in compliance with legal laws and regulations, both national and international,
- choosing suppliers with the conviction that only responsible practices in the supply chain, can provide the highest quality of the final product or service, while simultaneously taking care of environment, good working standards, business ethics and local communities.

Sustainability is a key area of focus for Comarch and we expect our suppliers to prioritise sustainability in their organizations. At Comarch we recognize that, as a global powerhouse specialised in design, implementation and integration of advanced IT services and software, our supply chain activities have a significant impact and that our responsibilities extend beyond our own operations into those of our suppliers. At the same time, we continuously strive to ensure that we deal with our suppliers in a transparent way.

Comarch is committed to high standards of business conduct as reflected in the Comarch Code of Conduct. We expect our suppliers to adhere to the similar good working standards and business ethics.

We require our primary supplier base to apply the following standards:

- demonstrate responsible environmental performance in line with ISO 14001 or similar to reduce the negative impact on the environment affected by supplier's operations,
- apply health and safety standards in line with OHSAS 18001 or similar to minimise risk associated with occupational hazards and prevent injury,
- understand the business conduct, social and environmental issues involved in supplier's activities,

- comply with applicable laws and regulations,
- permit workers' freedom of association and right to collective bargaining,
- not to discriminate on any basis: race, social status, ethnicity, religion, impairment, disability, sex, sexual orientation, political affiliation and views, age, and marital status,
- eliminate the use of children below the age of fifteen, corporal punishment, mental and physical coercion, insults and sexual harassment,
- eliminate the use of forced and bonded labour.

In addition, we expect our suppliers to support the United Nations Universal Declaration of Human Rights that sets "common standards of achievement for all people and all nations".

Principles of co-operation:

We recognise the necessity to collaborate with our suppliers in achieving these standards and requirements. It is our policy to work with our suppliers on the basis of following principles. We will:

- work collaboratively with suppliers in pursuit of these standards,
- welcome, rather than penalise, suppliers who strive to identify activities that fall below these standards and work towards achieving improved conditions,
- consider an alternative ethical trading standard where suppliers are already working towards this alternative,
- focus attention on those part of the supply chain where the risk of not meeting these standards is highest and where the maximum difference can be made with resources available.

This policy has been adopted by the Comarch CG Management Boards. The policy is subject to continuous review. All changes must be approved by the Comarch S.A. President.

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Comarch Spółka Akcyjna with its registered seat in Kraków at Aleja Jana Pawła II 39a, entered in the National Court Register kept by the District Court for Kraków-Śródmieście in Kraków, the 11th Commercial Division of the National Court Register under No. KRS 000057567. The share capital amounts to 8.133.349,00 zł. The share capital was fully paid, NIP 677-00-65-406