



COMARCH

**CONSOLIDATED
NON-FINANCIAL DATA REPORT
FOR 2017**

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1. Comarch S.A.'s Management Board's Statement Addressed to the Company's Shareholders in the Field of Reporting Non-financial Issues

G4-1

Dear Shareholders,

The Comarch Group, due to the size of the company and the scope of its activity, exerts a significant influence on its environment, especially in the economic and social spheres. Sustainable development was one of the key foundations of the company's strategy from the very beginning and, in the opinion of the Group's Management Board, contributed significantly to the company's market success.

This Non-Financial Data Report of the Comarch Group is the second in a row and the first published after the entry into force of such obligation. Regardless of the formal requirements, Comarch has been using good practices in the field of non-financial reporting for many years (including through the publication of relevant information on the Internet and in annual reports). This results both from the internal need to communicate with shareholders, as well as compliance with the Corporate Governance Principles for listed companies and the provisions of the Accounting Act.

Due to the business profile of the company, social issues related to employment and human rights as well as issues related to diversity management, especially in the area of management and supervisory bodies, are the key issues for Comarch regarding sustainable development. In the opinion of the Management Board of the Comarch Group, adherence to relevant standards and reporting on them is essential for proper human resources management, and thus is a key element for ensuring long-term development and maintaining the competitive advantage of the company.

The key events related to sustainable development and non-financial reporting, recorded in the reporting period, were continuous improvement of management quality, increased role of "soft" incentives, increased promotion of physical and cultural activity among employees, increased management awareness of issues related to diversity, as well as improving suppliers' management procedures. The Comarch Group in 2017 also carried out activities to protect the natural environment, including before implementing energy-saving technologies during infrastructural investments and promoting pro-ecological attitudes among the crew. The Group constantly supports various initiatives of local communities and significantly increased the scale of charitable activities.

The Management Board of Comarch S.A. points that the Non-Financial Information Report for 2017 includes non-financial information regarding Comarch S.A. and the Comarch Capital Group. The report was prepared in accordance with the requirements of non-financial reporting included in the Accounting Act of 29th September, 1994, European Commission guidelines on reporting on non-financial information and on the basis of the National Non-Financial Information Standards (SIN) and international Global Reporting Initiative (GRI) guidelines sustainable development reports. The most important challenges and goals of the organization for the next year in the field of non-financial reporting include improvement of processes within the organization, allowing to achieve the target quality and completeness of reporting, as well as reducing its labour intensity.

Management Board of Comarch S.A.

2. Information about Comarch Capital Group

G4-3, G4-4, G4-5, G4-7, G4-14, G4-16

G.1.1., G.1.2.

The core business of the Comarch Capital Group ("Comarch Group", "Comarch"), whose parent company is the joint-stock company Comarch S.A. with its registered office in Krakow at Al. Jana Pawła II 39 A ("Company"), there is activity related to software - PKD 62.01.Z. Designation of the registry court for Comarch S.A.: District Court for Kraków - Śródmieście in Kraków, XI Commercial Department of the National Court Register. KRS number: 0000057567. Comarch S.A. has a dominant share in the Group in terms of revenues, value of assets and the number and volume of contracts. Shares of Comarch S.A. are admitted to public trading on the Warsaw Stock Exchange. The duration of the parent company is not limited.



The Comarch Capital Group is a producer of innovative IT systems for key sectors of the economy both in Poland and abroad. The main strategy of Comarch is to provide customers with complete IT solutions based on their own products, also in the service model. Thanks to the employed high-class specialists and thanks to its professional infrastructure, Comarch is able to provide both IT products as well as services for their implementation, maintenance and hosting as well as advisory and integration services for clients all over the world. Thanks to this, recipients of products and services offered by Comarch can take full advantage of the opportunities offered by modern IT systems and optimize their business processes.

The wide range of Comarch's offer includes ERP class systems, financial and accounting systems, CRM systems, loyalty software, sales support and electronic document exchange systems, electronic banking systems, ICT network management systems, billing systems, Business Intelligence software, security

management services and data protection, and many other solutions. Comarch is a solution provider, including for entities from public administration, banking, accounting offices, enterprises from the FMCG sector, airlines, automotive industry, medical sector, manufacturing companies, public utilities, capital markets, telecommunications and insurance companies, universities, commercial and service companies, transport companies, fuel suppliers as well as entities conducting brokerage, e-commerce or factoring activities. A detailed description of the products and services provided was included in point 3 of the Report of Comarch S.A.'s Management Board regarding the activities in 2017 and Report of Comarch S.A.'s Management Board regarding the activities of the Capital Group in 2017.

When planning its development strategy, Comarch takes into account social and environmental aspects consciously limiting the impact of its operations on the natural environment, minimizing the consumption of natural resources and limiting the generation of waste generated as a result of the current

G4-16

Comarch is a member of important organizations in the field of IT, such as, ETIS, PIKOM and TeleManagement Forum, thus has continuous access to the latest standards emerging in these areas (e.g. standards on TAP/RAP). Comarch also belongs to international commercial and economic chambers, including the Polish-German Chamber of Commerce and Industry and the French-Polish Chamber of Commerce. It is also a member of Związek Maklerów i Doradców, ZMiD (the Association of Brokers and Advisers), an organization associating people holding licenses of securities brokers, investment advisors and commodity exchange brokers. In Spain, Comarch is a member of the Confederación de Empresarios de Málaga (CEM, the Confederation of Employers of Malaga). CEM is an organization of entrepreneurs of a confederate and intersectoral character, with a provincial range. In Japan, Comarch is part of the 21c Club, business club under EGG JAPAN. 21c Club

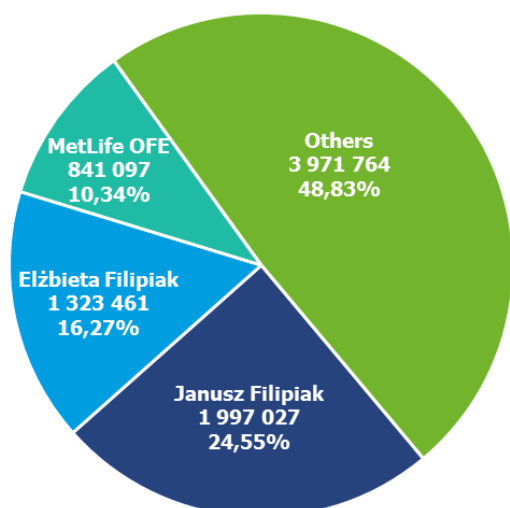
supports companies in creating and developing new B2B companies and is a platform for exchanging knowledge and experience. Comarch is also a member of the LF Networking Fund, a newly established initiative of The Linux Foundation, which strengthens cooperation between partners and increases operational efficiency in network development projects.

Other basic information about Comarch S.A. and the Comarch Group were published respectively in point 1 of the Report of Comarch S.A.'s Management Board regarding the activities in 2017 and Report of Comarch S.A.'s Management Board regarding the activities of the Capital Group in 2017.

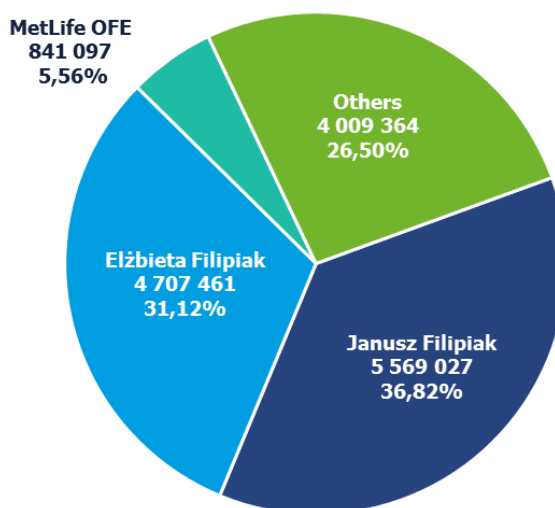
2.1. Shareholders Owning Directly or Indirectly through Subsidiaries at least 5% of the Total Number of Votes at the General Meeting of Comarch S.A., as at 27th of April, 2018

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Shareholders by number of shares



Shareholders by number of votes



2.2. The Scope of Activity of the Comarch Group in the World

G4-6, G4-8, G4-9

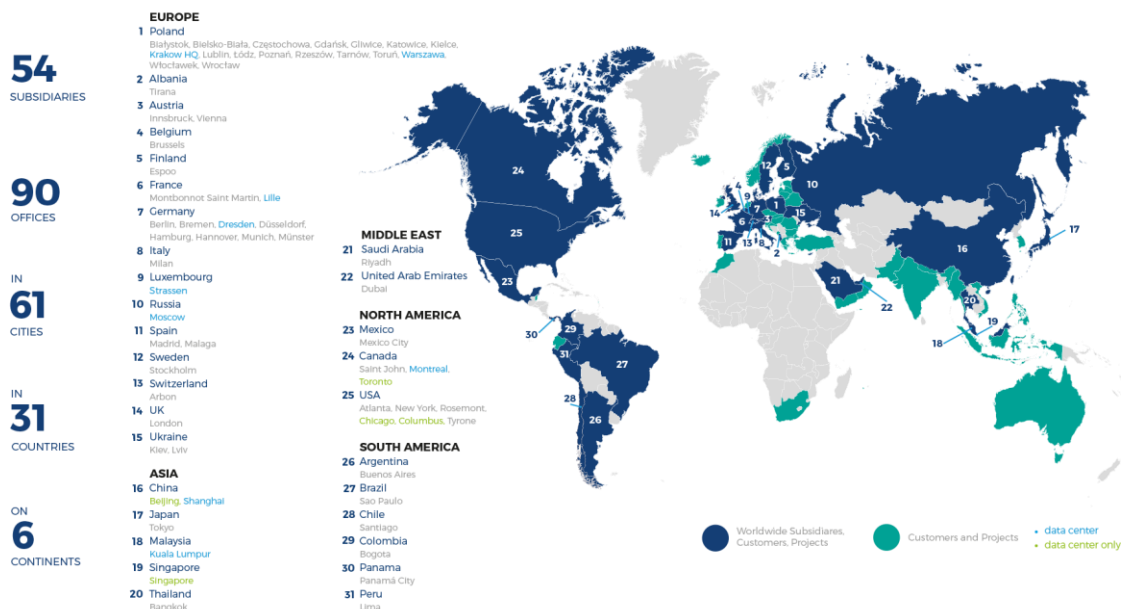
As at the date of publication of the report, Comarch S.A. has 14 branches in Poland and 1 in Albania, the Comarch Group consists of 52 companies located on 6 continents, in 29 countries, in 90 locations around the world. Last year, the Group successfully continued its growth strategy based on the diversification of its operations between various industry segments, the development of its own products and their sale on the global market. For many years, one of the main strategic goals of Comarch is the development of sales of more and more products on foreign markets, in particular in Western Europe, both Americas and Asia. In the previous year, the Comarch Group established new subsidiaries - Comarch Japan KK with its registered office in Tokyo and Comarch Saudi Arabia Co. with its registered office in Riyadh. In 2018, there are planned further equity investments on the domestic and foreign markets. Detailed information on changes in the organizational structure can be found in point 1 of the Consolidated Financial Statements for 2017.

G4-13

In the reporting period, there was an increase in cooperation with foreign suppliers related to the realization of purchases for own production of Comarch S.A. and related to increasing the company's effort towards research and development.

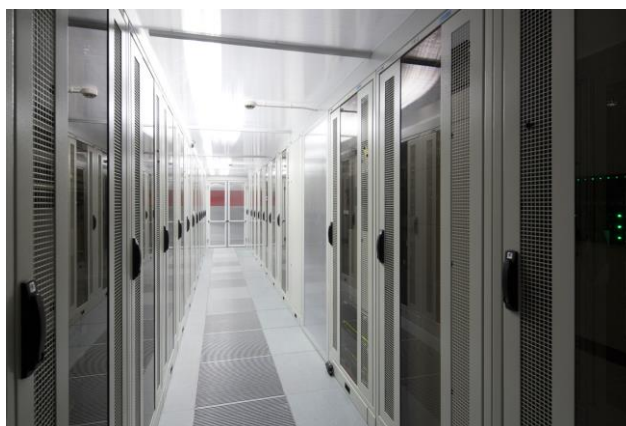
As at 31st of December, 2017, in Comarch S.A. there were 4,303 employees compared to 4,276 persons as at 31st of December, 2016, and in the Comarch Group number of employees reached 5,541 persons compared to 5,490 persons as at the 31st of December, 2016.

The map below presents the activities of the Comarch Group in the world:



Comarch provides comprehensive data centre services embracing the provision and maintenance of complex system platforms, including hardware, software and administration.

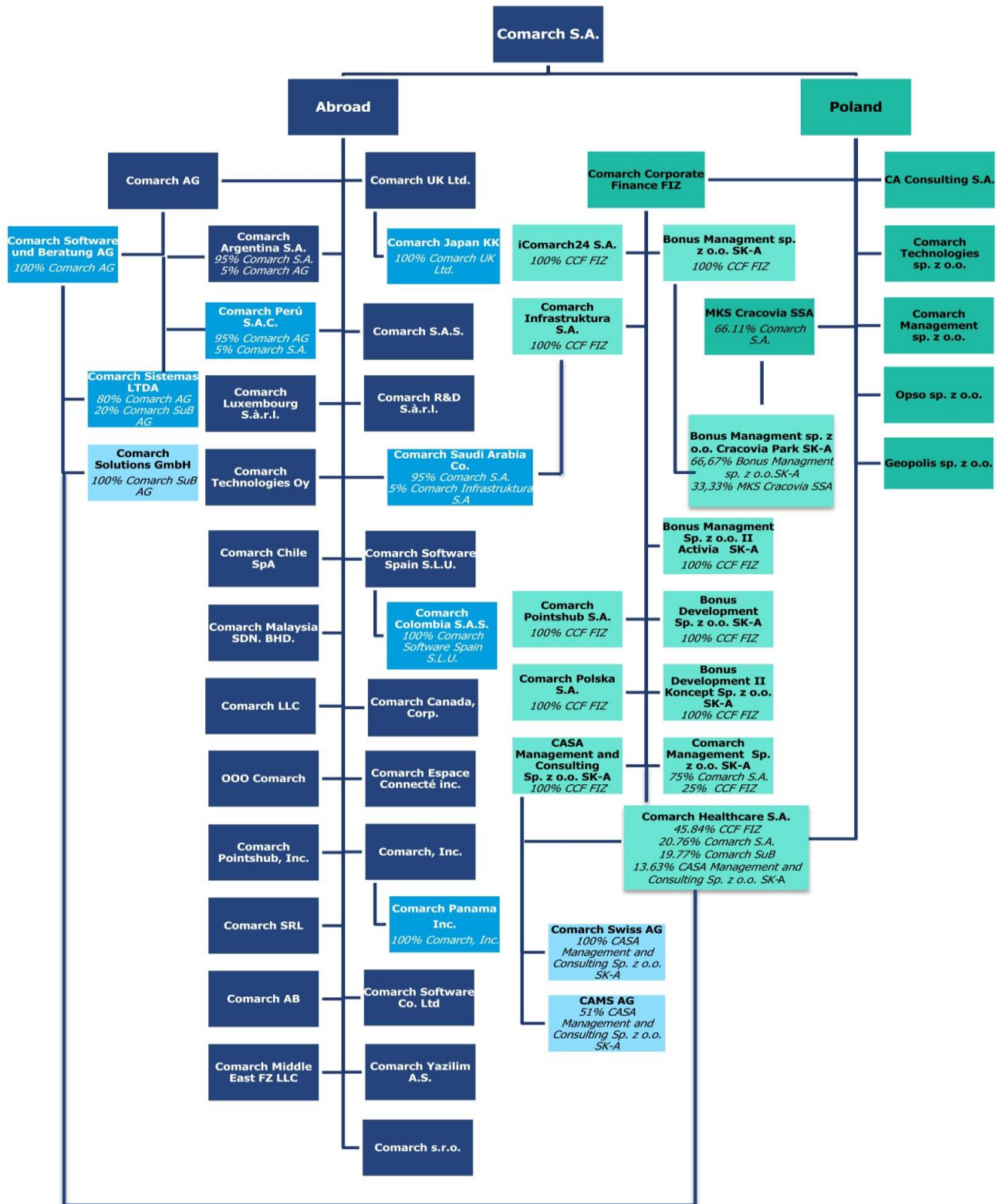
G4-8 Comarch stores data in 15 data centres worldwide (including Chicago, Singapore, Moscow, Berlin) including four of its own (Kraków, Warsaw, Dresden, Lille).



2.3. Structure of Comarch Capital Group as at 31st of December, 2017

G4-6, G4-9, G4-17

The Consolidated Financial Statement of the Comarch Group for 12 months of 2017 include the statements of the following companies. This Non-Financial Information Report covers all entities of the Comarch Capital Group included in the Consolidated Financial Statement.



■ 100% Comarch S.A., unless otherwise indicated.

2.4. Basic Economic and Financial Data

G4-9, G4-22, G4-23, G4-28, G4-29, G4-30, G4-33, G4-EC1

This report includes data for 2017 and comparative data for 2016. For the Company this is

the second year of publication of the non-financial data report. The company published for the first time a non-financial report on 28th of April, 2017 for the year 2016. No significant adjustments were undertaken to the information contained in the previous report.

This report is not a subject of certification as well as external verification by professional auditors.

COMARCH S.A. SELECTED FINANCIAL DATA (in thousands of PLN)	2017	2016	Change
Revenue	755,517	749,213	0.8%
Operating profit	40,533	78,834	-48.6%
Profit before income tax	44,244	56,546	-21.8%
Net profit attributable to shareholders	39,338	45,588	-13.7%
Total assets	1,247,206	1,162,245	7.3%
Liabilities and provisions for liabilities	450,222	390,503	15.3%
Non-current liabilities	154,762	121,363	27.5%
Current liabilities	155,174	126,800	22.4%
Equity	796,984	771,742	3.3%
Share capital	8,133	8,133	0.0%
Number of shares	8,133,349	8,133,349	0.0%
Declared or paid dividend	1.5	-	-

In 2017, revenues increased by PLN 6.3 million, i.e. 0.8% compared to the previous year. Operating profit amounted to PLN 40.5 million and was lower by 48.6% compared to 2016, net profit decreased by PLN 6.3 million, i.e. 13.7% compared to previous year. In 2017, EBIT margin dropped from 10.5% to 5.5% in 2017, net margin dropped from 6.1% to 5.2%.

Comarch S.A.'s detailed financial analysis is presented in point 9 of the Report of Comarch S.A.'s Management Board regarding the activities in 2017.

COMARCH GROUP CONSOLIDATED FINANCIAL DATA (in thousands of PLN)	2017	2016	change
Revenue	1,102,520	1,112,813	-0.9%
Operating profit	35,774	116,893	-69.4%
Profit before income tax	64,559	104,777	-38.4%
Net profit attributable to shareholders	42,036	73,034	-42.4%
Total assets	1,501,915	1,444,875	3.9%
Liabilities and provisions for liabilities	622,883	582,811	6.9%
Non-current liabilities	237,668	196,921	20.7%
Current liabilities	385,215	385,890	-0.2%
Equity attributable to shareholders	862,904	847,423	1.8%
Share capital	8,133	8,133	0.0%

Number of shares	8,133,349	8,133,349	0.0%
Declared or paid dividend	1.5	-	-

In 2017, revenues was lower by PLN 10.3 million, i.e. 0.9% compared to previous year. Operating profit amounted to PLN 35.8 million and was lower by 69.4% compared to 2016. In 2017, Comarch Group's activity was profitable. The margin on sales and the EBIT margin decreased to the levels of 24.5% and 3.2%, respectively. The gross margin and the net margin were satisfying and reached values of 5.9% and 3.8%, respectively.

In the Comarch Group's revenues, a very high share (over 90%) has goods and services with high added value, in particular software produced by employees. Sales of third-party solutions are of minor importance in the sales of the Comarch Group.

Comarch S.A.'s detailed financial analysis was presents in point 9 of the Report of Comarch S.A.'s Management Board regarding the activities in 2017.

2.5. Awards and Rankings in 2017

■ Comarch in the second stage of the Issuer Golden Website competition (Złota Strona Emitenta)

Comarch qualified for the second stage of the 10th edition of the Competition for the best website of the listed company - Issuer Golden Website X. In the first stage of the Competition, 889 websites of Polish and foreign listed companies, whose shares were listed on the Warsaw Stock Exchange on 31st of August, 2016, including also on the market NewConnect, were assessed. In 2017, 57 listed companies ranked at the first stage of the Competition qualified for the second stage of the Competition. The companies showed equally high level of the substantive content of websites.

■ Comarch in 100 largest IT companies in Poland - ITwiz Best 100 report

In May 2017, the ITwiz Best 100 report for 2016 was published. Comarch was the winner in the category of "Companies with the largest revenues from the sale of Cloud Computing services" in 2016. Additionally, Comarch was in the lead in several other categories, including companies with the largest employment (2nd place), sales of mobile applications (2nd place), revenues from the industrial sector (2nd place), telecommunications (2nd place), trade (2nd place) and sales of ERP class systems (3rd place).

Comarch Group was in the top ten in the "Income of the largest IT capital groups" ranking. In 2016, Comarch generated revenues of PLN 1.112 million, which gave it 7th place in this category.

■ Comarch as a leader in TOP 200 "Computerworld"

In June 2017, TOP 200 „Computerworld” ranking for 2016 was published.

Once again Comarch stood on the podium of the ranking. In this edition, he became a leader in the category of a company with the largest increase of employment and the largest provider of mobile applications. Comarch has also been the winner in the list of IT providers for responsible development.

■ 20th anniversary award of Krakow Technology Park

Comarch received the Krakow Technology Park award on the occasion of the NonStop Future, the 20th anniversary of the company's operation.

In the justification, we can read:

Thanks to, among others, this company, Krakow is today perceived as one of the best places to locate modern knowledge-based investments. The company, operating all over the world - in the broadly understood IT sector - is the best business card of Krakow.

At the same time, it can be an example for all start-ups. Company has its roots in the academic environment, it grew out of the university, almost in the proverbial garage, to become a global brand after 24 years of activity. The first permit in the Special Economic Zone in Krakow was received by Comarch in 1998. It was the second permit issued by KPT. Since then, the company's activities have been closely related with functioning in the zone.

Source: <http://www.kpt.krakow.pl/wydarzenia/>

■ **Comarch awarded in the IT@BANK 2017 ranking**

Comarch was honoured in the IT @ BANK 2017 ranking, receiving the second prize in the major category, a special prize for development potential. Comarch became a leader in the category of companies in the financial sector - integrators and software suppliers.

IT@BANK is the largest annual conference in Poland dedicated to the issues of computer banking, which gathers an elite group of IT decision-makers from banks, insurance companies, credit unions and technology companies. The organizer is Centrum Prawa Bankowego i Informacji (the Centre of Banking Law and Information), the publisher of "Miesięcznik Finansowy BANK" - a magazine for bank management staff - in cooperation with Rada Bankowości Elektronicznej (the Electronic Banking Council) and Forum Technologii Bankowych (the Banking Technology Forum) at the Polish Bank Association. Awards have been awarded for 12 years

■ **Comarch solution in the "Vendor Landscape: B2B Business Networks, 2017 To 2018" report**

Analysts from the Forrester research company appreciated the Comarch solution in the "Vendor Landscape: B2B Business Networks, 2017 To 2018" report, which presents solutions ensuring efficient and secure data exchange throughout the entire supply chain. This is another distinction for the Comarch system. Previously, the analytical company Gartner included Comarch software in the "Magic Quadrant for Integration Brokerage" report.

■ **Supplier Worth Recommendation- ING Bank Śląski**

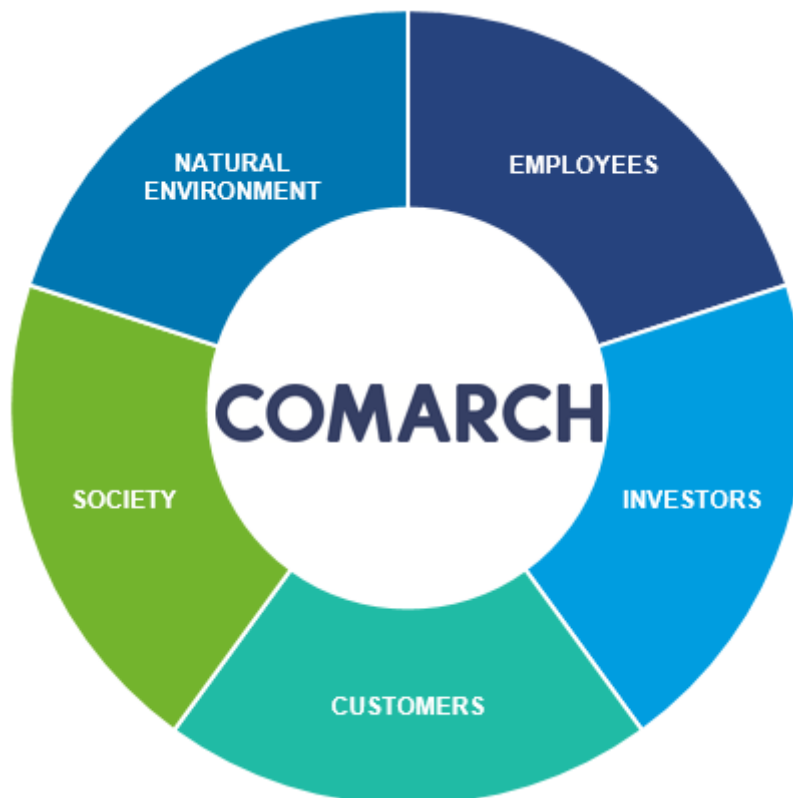
Comarch was honoured by ING Bank Śląski and recognized as the Supplier Worth Recommendation during the December conference "In search of a common denominator".

Supplier Worth Recommendation 2017 is a distinction awarded by ING Bank Śląski to those companies that provide services at the highest level and which are characterized by flexibility of operation. Comarch was among the winners and was recognized for "outstanding flexibility, readiness to change the work model and creating global solutions responding to the needs of clients in the Agile era".

■ **The title „CEO of the Year” for Professor Filipiak**

The editors of the Parkiet daily for the 24th time awarded the top league of Polish capital market with the "Bulls and Bears" prize. The title of "CEO of the year" was given to Professor Janusz Filipiak. The jury awarded Professor Filipiak for the consistent development of Comarch for twenty-five years.

3. Stakeholders



a) List of stakeholder groups engaged by the organization:

G4-24

- **Employees** (full-time employees and co-workers, interns, apprentices, students and potential employees, employees of subcontractors and suppliers, labour inspection and other similar supervisory institutions),
- **Investors** (shareholders, institutional investors, individual investors, Warsaw Stock Exchange, brokerage houses, banks, Polish Financial Supervision Authority, KDPW),
- **Customers** (institutional clients, individual clients, business partners, key suppliers, subcontractors, local self-government administration, government administration),
- **Society** (local communities within the Comarch Group's activity, residents, government and self-government authorities, media, universities and research workers, technical and industry organizations),
- **Natural environment** (environmental organizations, recycling companies).

G4-25

b) An identity and selection base was the definition of a stakeholder - as a subject that influences the Comarch Group and which is affected by the Comarch Group.

c) The organization's approach to engaging stakeholders:

G4-26

- **Employees** (recruitments, performance reviews, internal meetings, internal portal for employees- Everybody/Intranet, internal publications/internal marketing, periodic happenings supporting an active lifestyle)
Dialog purpose: ensuring stabilization of employment turnover by meeting employees' expectations, providing employees with development opportunities, creating a satisfactory and stable workplace,
- **Investors** (regular meetings at summary conferences in Krakow or Warsaw (also interactive on-line broadcasts), individual meetings and teleconferences with the Management Board of the Company, permanent cooperation of Capital Market and

Insurance Department with stakeholders listed in point a), Investor Relations website, participation in conferences co-organized by financial and capital market institutions such as banks, investment funds, WSE, KDPW, Polish Financial Supervision Authority, and Polish Association of Listed Companies),

Dialog purpose: ensuring information transparency, meeting the information needs of stakeholders, building Comarch value, taking care of Comarch's reputation,

- **Contractors** (Company website, customer satisfaction survey, business meetings for the needs of contract performance and improvement of the quality of provided services),

Dialog purpose: customer expectations and opinions survey, listening the client's voice in designing business solutions, creating products and services tailored to needs of customers,

- **Society and government/local government authorities** (current direct communication, realization of sponsorship projects, building partnerships, realization of joint projects, organization of educational and preventive programs for health protection, organization of internship programs),

Dialog purpose: carrying social responsibility, supporting community development, supporting students and graduates in gaining knowledge and experience, ensuring compliance with requirements and regulations, jobs creation,

- **Natural environment** (organizing pro-ecological campaigns, cooperation with environmental organizations and recycling companies),

Dialog purpose: improvement of the quality of the natural environment, reduction of energy consumption, emission of pollution, reduction of the amount of waste generated.

4. Policies and Rules Adopted and Applied by the Comarch Group and Their Impact on Particular Aspects and Identified Risks

G4-15, G4-18, G4-19, G4-27

The selection and description of policies as well as the effectiveness indicators presented in the report has been made on the basis of the materiality criteria, taking into consideration internal and external factors related to the

operations of Comarch S.A. and the Comarch Group. The main factors taken into consideration during the materiality assessment were:

- Business profile and market environment,
- The brunch in which Comarch operates,
- Impact on the community and the natural environment,
- Stakeholders' expectations.

The Management Board actively participates in the process of defining the content of the report and approves all strategic decisions related to the process of creating a non-financial data report. During its creation, the expectations of stakeholders were also taken into consideration.

For over 20 years, Comarch has been consistently building an organizational culture and value system, including:

- Continuous and systematic care of the quality and competitiveness of our products and services,
- Tailoring products and services to the expectations and requirements of our clients,
- Developing mutually beneficial cooperation with suppliers in order to improve the quality of offered products and services,
- Data protection and strengthening the trust of our clients and other interested parties in the field of information security,
- Continuous improvement of employees' qualifications through an appropriate education system and training focused on issues related to quality, information security, environmental protection and work safety,
- Promotion of a healthy and active lifestyle,

- Permanent improvement of occupational safety and health of employees, improvement of comfort of the workplace,
- Prevention of accidents at work, occupational diseases and events potentially conducive,
- Taking pro-active measures to reduce negative environmental impacts,
- Compliance with applicable legal and other requirements,
- Continuous improvement of the effectiveness of the Integrated Management System, including AQAP 2110 and AQAP 2210,
- Providing appropriate resources and means to implement the above actions.

The culture and value system of Comarch are systematized through the following policies, codes and declarations:

- As part of the Integrated Management System implemented in the Comarch Group:
 - Policy of Integrated Management System,
 - Policy of Internal Control System,
 - Security Policy,
 - Supplier Sustainability Policy,
 - Policy of Privacy,
 - Policy of Respect for Intellectual Property of Third Parties,
 - Code of Conduct,
 - Quality Management of Medical Devices,
- Declaration of polish business for sustainable development,
- Corporate Social Responsibility (CSR),
- Corruption counteracting,
- Corporate Governance Principles.

4.1. Integrated Management System

G4-15, G4-19

G.2.2

Comarch puts a particular emphasis on the quality of provided products and services. Efforts for increasing this value are undertaken to satisfy the growing and well-defined expectations of clients operating on the domestic and international market. Thanks to continuous work on the improvement and development of the Integrated Management System, Comarch obtained:

- Certificate of Integrated Management System compliant with the requirements of PN-EN ISO 9001:2009 Quality Management Systems, PN-EN ISO 14001:2005 Environmental Management Systems, PN-N-18001:2004 Occupational Safety and Health Management Systems, PN-ISO/IEC 27001:2014-12 Information Security Management Systems,
- Certificate of the Internal Control System that meets the requirements of the ICS Criteria,
- Certificates which confirm that the Quality Management System meets the requirements of AQAP 2110: 2009- NATO requirements for quality assurance in design, development and production as well as AQAP 2210: 2015- NATO supplementary requirements for AQAP 2110 regarding software quality assurance,
- Certificate which confirms that the Quality Management System of Medical Devices meets the requirements of EN-ISO 13485:2012 Medical Devices. Quality Management Systems. Requirements for the purposes of legal provisions.

Certificates of the Integrated Management System and Internal Control System were issued by the Polish Centre for Testing and Certification (PCTC). The certification body for the AQAP system at Comarch is the Quality Certification Centre (QCC) operating at the Military University of Technology.

Policy of Integrated Management System

[dimensions: society, employment, environment, respect for human rights, corruption counteracting]

The Integrated Management System ensures proper, systemically administered implementation of all business processes affecting the quality of products and services. The proper functioning of the system guarantees that all processes are monitored in terms of effectiveness and efficiency, improved and adapted to the constantly changing market and technological conditions as well as to the changing customer requirements. High quality of products and services is supported by constant care for the

environment and for the safety of employees and suppliers. Applying the principles of systems implemented in Comarch contributes to the increase of trust between the company and customers and suppliers. It also strengthens the image of Comarch in the eyes of all entities interested in the effects of our company's activities in the areas of quality of offered products and services, environmental impact, ensuring occupational safety and health, as well as ensuring information and data security and control in dual-use goods trading.

G4-2

G.3.2.

As part of the Integrated Management System Policy, the following critical risks were identified:

- Risk related to the occurrence of non-compliance and instability in internal processes,
- Risk related to the deterioration of the quality of products and services offered,
- The risk of losing customers due to failure to meet their quality expectations,
- Risk related to insufficient level of protection of information assets and information security,
- Risk related to insufficient knowledge and training of employees in specific areas,
- Risk related to insufficient level of occupational safety and hygiene of employees,
- Risk related to accidents, occupational diseases and events potentially conducive,
- Risk related to the negative impact on the environment,
- Risk related to failure to meet the requirements of applicable contracts, including the implementation of Government Quality Assurance,
- Risk related to improper documentation management,
- Risk related to incorrect and ineffective internal and external communication,
- Risk related to incorrect determination of responsibility and entitlements,
- Risk related to non-compliance with legal requirements and internal procedures.

G.2.1, G.3.1.

Within the Comarch Capital Group, there are a set of mechanisms whose effective functioning allows to state that the company operates in accordance with the applicable internal regulations and rules - both at the national and international level. These mechanisms include, among others: establishing internal procedures defining processes and responsibilities, constant supervision over legal requirements, ongoing verification of process realization as part of internal audits and using internal IT systems dedicated to individual issues.

G4-14

All the activities described above aim at minimizing identified risks, managing them and keeping current control. The Comarch Group in its operation at all levels of the organizational structure applies the precautionary principle, especially during the development and marketing of new IT products.

In order to implement the assumptions of individual policies, within the Comarch Group there are assigned to them e-mail addresses to which employees can submit their comments. Employees also have the opportunity of making anonymous claims regarding the violation of the provisions of the implemented policies, which are forwarded to the recipients in paper form via internal mail.

As part of internal audits, there are statistics on non-compliance with the internal procedures of the Integrated Management System. There is also kept a register of strengths and weaknesses of audited entities. In 2017, 80 non-compliances, 218 strengths and 197 potentials for improvement were identified.

Detailed information on the Comarch's IMS Policy can be found at: <https://www.comarch.com/company/quality/>.

Policy of Internal Control System

[dimensions: society, respect for human rights]

G.2.3.

Broadly understood technological development and rapidly growing competition put new requirements on software, implemented IT systems and goods in circulation. The necessity to meet these requirements means that the products provided by Comarch may be goods of dual-use and be used in a manner inconsistent with the principles of national and international law. To prevent such practices, the Internal Control System has been implemented within the Comarch Capital Group, whose main document is the Policy of Internal Control System. The main assumptions of this policy are as follows:

- Excluding the possibility of making a profit contrary to the requirements of the Internal Control System,
- Omission to handle trade in goods when it is contrary to national and international law,
- Enforce the rules of the Internal Control System at all workstations related to trade in goods,
- Supervision of the Proxy for Turnover Control over the course of the Internal Control System processes.

G4-2

G.3.2.

As part of the Integrated Management System, the following critical risks were identified:

- The risk related to incorrect classification of products and services under ICS,
- The risk related to undertaking a cooperation with a contractor on the list of refusals,
- Risk related to the realization of transactions with entities from countries subject to legal sanctions,
- Risk related to non-compliance with legal requirements and internal procedures regarding IMS.

G.3.1.

Minimization of risks related to international trade in goods is carried out within the mechanisms described in the section "Policy of the Integrated Management System". In the case of the ICS, an important role play IT systems dedicated to issues related to them, e.g. a system of the contracts workflow, where individual steps enforce specific actions required by IMS. Specific, for ICS, processes, such as dealing with dual-use goods and services or verification of contractors on refusal lists, are described in internal procedures.

Supervision over specific, for ICS, processes is carried out as part of internal audits. Non-compliances, potential risks and opportunities are identified. There are also statistics in this area. In 2017, 2 non-compliances directly related to ICS were identified as part of internal audits.

Security Policy

Information and information processing systems constitute critical and extremely important goodwill, which is why Comarch places great emphasis on protecting data and own and customers assets. A comprehensive information protection system based on the PN-ISO/IEC 27001:2014-12 and ISO / IEC 27002:2013 standards was implemented. The system has been certified by the Polish Centre for Testing and Certification (PCTC) since 2008 as part of the Integrated Management System. The system covers all internal processes supporting the company's activity and business processes and covers all of the company's assets.

The Security Policy regulations include organizational issues, raising of employee awareness, physical asset protection, IT technical security, business continuity and response to incidents of information security breaches. Internal policies and procedures have been defined to regulate the confidentiality, integrity and availability of Comarch and clients data, which in particular define:

- Rules for classifying and handling information,
- Comarch IT network management policy,
- Systems and application administration rules,

- Principles of staying at and access to Comarch premises,
- Principles of the use of assets and bringing equipment out of Comarch,
- Principles of securing personal computers,
- Principles of securing information mediums,
- Principles of remote access,
- Principles of email security,
- Password policy,
- Business continuity policy,
- Antivirus policy.

Many organizational and technical measures were implemented to ensure comprehensive and multi-level protection of data and assets to counteract and minimize the effects of information security incidents.

The system ensures a continuous process of monitoring and reacting to information security risks. It allows to continuous improvement of Comarch's as well as clients data and assets protection. Conclusions from the operation of the safety management system are reported to the Management Board and necessary improvements and corrective actions are taken.

Among the most important risk, which are counteracted by the implemented security measures, can be mentioned:

- breach of information security,
- unauthorized operations,
- unavailability of key services and Comarch space,
- compliance with regulations.

Within the company dedicated business units operate to deal with information protection, determination and implementation of standards and monitoring the security of Comarch's assets.

Business continuity plans were developed to maintain business continuity in key areas of the company.

Sustainable Development Policy for Suppliers

[dimensions: society, employment, environment, respect for human rights, corruption counteracting]

Comarch as a global organization specializing in the design, implementation and integration of advanced IT products has a significant impact on the functioning of the supply chain. In addition, as a company, we realize that the success of undertaken projects depends not only on us but also, to a large extent, on our business partners. The key issue is the appropriate selection of contractors who satisfactorily meet certain criteria. Thanks to this, we can be sure that cooperation with them will in no way disturb the stability and efficiency of processes implemented within the supply chain.

The Comarch Capital Group has a Sustainable Development Policy for Suppliers, which defines the most important principles that the company follows during realizing the cooperation with business partners. In addition, this document is a commitment to a sustainable development policy and sets out requirements for key suppliers.

These commitments are implemented mainly through:

- Supporting and encouraging our clients and suppliers to act in accordance with the principles of ethics, social responsibility and environmental protection,
- Building a good partnership with suppliers based on mutual cooperation, trust and integrity,
- Conducting activities related to orders in accordance with rules of law and legal regulations-domestic and international,
- Selection of suppliers with the conviction that only responsible practices in the supply chain can ensure the highest quality of the final product or service, while at the same time caring for the environment, good work standards, business ethics and local communities.

We are convinced that high standards of conduct in business, to which Comarch undertakes to comply, should be also enforced from our contractors. That is why we require the following rules from our key suppliers:

- Managing environmental impact in a responsible manner in accordance with ISO 14001 or similar standards to reduce the negative impact on the environment,
- Applying occupational health and safety standards in accordance with OHSAS 18001 or a similar standard to minimize the risks associated with occupational risk and prevent injuries,
- Use with understanding of good business practices, social issues and related to environmental protection, which are related to the activities of the supplier,
- Operation in accordance with applicable law,
- Recognition of employees' right to associate and collective bargaining,
- Prohibition of discrimination in all its manifestations, due to: race, social status, ethnic origin, religion, disability, invalidity, gender, sexual orientation, relationship or political affiliation, age or marital status,
- Prohibition of employment of children under 16 and to apply corporal punishment, mental and physical coercion, abuse and sexual harassment,
- Elimination of forced labor.

G4-2

G.3.2.

As part of the Sustainable Development Policy for Suppliers, the following critical risks were identified:

- Risk of disturbances of stability and efficiency of processes implemented within the supply chain,
- The risk of establishing cooperation with contractors who do not meet the requirements of the Policy and violate the principles of ethics, social responsibility and environmental protection,
- Risk related to the insolvency of contractors,
- Risk related to non-compliance with legal requirements and internal procedures regarding contractors.

G.3.1.

Cooperation based on principles followed by Comarch, consistent enforcement of requirements for contractors and the use of verification mechanisms and ensuring compliance with applicable regulations allow to effectively minimize the risk of instability and incompatibility within the supply chain. These mechanisms and relevant data are presented in the section "Policy of Integrated Management System" and in Chapter 5. Contractors.

Policy of Respect for Intellectual Property of Third Parties

[dimensions: society, employment]

As a software development company, the Comarch Group understands the need to respect intellectual property rights and, for its part, strives to fully respect the intellectual property of third parties, including other software developers, as well as Comarch's suppliers and customers. Comarch abides by legal regulations concerning the principles of respecting intellectual property of third parties at the level of international, community and national law and supports the system of intellectual property protection. Comarch makes every effort to ensure the highest level of protection of intellectual property rights of third parties.

The basic policy objectives in force in the Comarch Group regarding these issues are:

- Taking care to ensure respect for intellectual property of third parties,
- Ensuring respect of patents, trademarks and other industrial property rights of third parties,
- The use of intellectual property, patents, trademarks and other industrial property rights of third parties in accordance with the law and the licenses obtained by Comarch,
- Use of third parties software only in the scope of licenses granted to Comarch,

- Protection of intellectual property, patents, trademarks and other industrial property rights of Comarch,
- Protection of Comarch's interests, in particular financial and legal,
- Care for the high quality of offered products and services,
- Risk management in the area covered by the policy,
- Intellectual property and licenses management.

Detailed objectives The policies resulting from the primary objectives are:

- Protection of intellectual property of Comarch's suppliers and recipients,
- Familiarizing Comarch employees with the policy and enforcing its compliance,
- Achieving transparency of the rules of using intellectual property of third parties by Comarch employees,
- Achieving the highest level of understanding and respecting for intellectual property rights,
- Prohibition of using the software by employees and associates of Comarch that infringes the intellectual property of third parties.

Comarch aims to achieve the objectives of the Policy by training employees and acting in accordance with the procedures ordering the process of evaluation, selection and acquisition of software and storage of licenses for:

- Software for Comarch's internal utility and office needs,
- Programming components and source codes for use in Comarch products,
- Programming components and source codes for use in programming services implemented in such a way that Comarch's work effects become the property of the client (Comarch dedicated products).

Policy objectives are also implemented through activities under the certified Export Control System, in accordance with the procedures for foreign trade in goods, technologies and services of strategic importance for national security, as well as for maintaining international peace and security.

The duties of each employee and co-worker of Comarch include knowledge and observance of the Policy of Respect for Intellectual Property Rights and procedures resulting from it, to the extent to which they relate to them, i.e. in the scope of:

- Responsibility for using Comarch software,
- Responsibility for using the software on Comarch hardware by an employee or co-worker,
- The manner of obtaining consent for the use of intellectual property of third parties in Comarch products and Comarch dedicated products,
- The manner of obtaining consent for the purchase of new software.

G4-2

G.3.2.

As part of the Respect for Intellectual Property of Third Parties Policy, the following critical risks were identified:

- The risk of using unlicensed software for internal needs,
- The risk of illegal use of software owned by third parties in Comarch products,
- Risk of potential financial and legal claims as well as image losses,
- Risk related to non-compliance with legal requirements and internal procedures in the scope regarding respect for intellectual property of third parties.

G.3.1.

The minimization of risks related to respect for intellectual property of third parties is carried out as part of the mechanisms described in the section "Policy of Integrated Management System". Both the supplier and the recipient of the software have the right to have their intellectual property rights respected. The guarantee of respect for intellectual property is the use of appropriate procedures by Comarch employees and co-workers while using this property. Realization of activities in accordance with the presented guidelines minimizes the risk of non-compliance with applicable legal regulations in this area and possible financial claims. In the case of detection or obtaining information regarding non-compliance with this Policy, as well as cases of intellectual property infringement of third parties, Comarch obliges its employees, co-workers, suppliers and recipients to report such cases to the Quality, Health and Safety Department and the Law Department via a dedicated email address.

Policy of Quality of Medical Devices

[dimensions: society, employment, environment, respect for human rights]

G4-PR1, G4-PR2

Besides the core activities related to software and IT systems development and the provision of services in this area, Comarch also conducts activities in the field of production and marketing of medical products and services.

In terms of health and safety impact, all products- medical devices created by Comarch Healthcare S.A. are tested. These products are subjected to appropriate analysis and certification.

With a view to improving the life quality and a sense of security and for the health of our clients, Comarch offers a wide range of products and medical services. Offered products are created as a response to market needs in the field of prevention and treatment, and are prepared on the basis of the latest technologies as a result of the cooperation of Comarch qualified employees with the scientific medical community. Comarch guarantees the right quality and safety of the offered products, professional and ethical service, as well as help and advice tailored to the individual needs of customers.

In order to implement the provisions of the Policy of Quality of Medical Devices, the Board and employees of Comarch undertake to:

- Adapt products and services to the expectations and requirements of clients, maintaining the requirements of legal regulations in the scope of production and distribution of medical devices and provision of medical services as well as in the field of IT products and services,
- Place products and services on the market that meet the quality and safety requirements,
- Reliably inform about the quality and safety of the offered products and services,
- Constantly and systematically take care for the quality and competitiveness of the offered products and services,
- Develop cooperation with suppliers to improve the quality of offered products and services,
- Raise qualifications,
- Constantly improve the efficiency of the quality management system.

The means of achieving the above objectives are implemented and constantly improved quality management systems developed and based on the requirements of:

- Directive 93/42/EEC Medical devices (MDD),
- EN-ISO 13485 Medical Devices standard. Quality Management Systems. Requirements for the purposes of legal provisions.
- ISO 9001 standards. Quality management systems. Requirements.

G4-2

G.3.2.

As a part of the Policy of Quality of Medical Devices, the following critical risks have been identified:

- The risk of placing products and services that do not meet the quality and safety requirements,
- Health, life and safety risk of users of medical products and services,
- The risk of deterioration in the quality of medical products and services,
- Risk related to non-compliance with legal requirements and internal procedures in the scope of medical devices and services.

G.3.1.

Risk management in the field of medical devices is an extremely important, systemically regulated issue. As part of the implemented and certified quality management system for medical devices in accordance with the ISO 13485 standard, the company has functioning the risk management process, described in internal procedures. This process includes the principles of identifying risks related to the medical device, its accessories and software, estimating and assessing the acceptability of risks, controlling these risks and monitoring the effectiveness of control.

In the case of medical devices, there is also a possibility to report the medical incidents, i.e. irregularities regarding a medical device that may or may have led to the death or serious deterioration of the health

of the patient or user of the device. A register of such cases is kept in Comarch. Since the beginning of the activity, no medical incidents have been identified in the field of medical devices.

4.2. Code of Conduct

G4-56, G4-HR3, G4-HR11

G.4.1., G.4.2., G.4.4., G.4.5., G.4.6., G.4.7., S.6.1.

[dimensions: society, employment, environment, respect for human rights, corruption counteracting]

The Comarch Group is convinced of the importance of respecting the existing regulations, legislation and acting in accordance with the ethical standards.

As one of the IT market leaders, Comarch feels obliged to promote ethics and wants to join the group of world leaders in terms of corporate responsibility, respect for human rights and environmental protection. Responsibility for achieving this goal lies with all employees of Comarch.

The Code of Conduct, in force in the Comarch Capital Group has been approved by its Management Board, which undertakes to regularly assess compliance with the principles contained in the Code and update its content based on the applications received.

The Code reflects the ethical values that the Comarch Group shares to and wishes to follow. It provides the employees of the Comarch Group with a pattern of behaviour towards their co-workers, supervisors and clients, partners and local communities, both in business and business-related relationships.

The Comarch Group Code of Conduct is disseminated and popularized through activities of the PR section of Comarch S.A.

The full text of Comarch's Code of Conduct can be found at: <https://comarch.com/company/code-of-conduct/>.

All ambiguities, problems related to the interpretation of the content of the Code of Conduct are solved by the Ethics Officer appointed by the Management Board. Comarch employees are encouraged to submit any comments and modifications related to the content of this Code of Conduct.

The duties of the Ethics Officer are:

- Supporting employees in compliance with the Code of Conduct,
- Promoting the idea of the Code inside the company,
- Updating the content of the Code,
- Responding to appropriate work on current employees' problems related to the ethics of their business activities.

G4-2

G.3.2.

As part of the Code of Conduct, the following critical risks were identified:

- Risk of violation of ethics, corporate responsibility, respect for human rights and environmental protection,
- The risk of child labour, forced labour, physical or mental coercion,
- The risk of discrimination in all its manifestations,
- Risk related to non-compliance with the rules of fair competition, prevention of bribery, illegal payments and corruption,
- Risk related to non-compliance with legal requirements, international standards regarding human rights and labour standards, internal procedures in the field of ethics.

G.3.1.

Comarch minimizes the risks related to non-compliance with the rules of the Code of Conduct by meeting basic recommendations for the safety of the work environment and adherence to international standards. Employees have the right to expect help and support from the Ethics Officer in the scope of reported inquiries to a dedicated email address. In addition, employees have the option of making anonymous reports about any violations of ethics through internal paper mail. According to the kept register, in 2015, on the above-mentioned

address, 2 infringements of the Code was received, in 2016, there was one infringement of the Code and, in 2017, no infringements was received. It should be emphasized, that none of the infringements of the Code was related to the violation of the labour law.

G4-HR3

G.4.3., S.3.4, S.6.2, S.6.3

Within the Comarch Group, there were no cases of discrimination or incidents of a discriminatory nature. In the case of any irregularities, including in the dimension of employment, employees have the opportunity to report them to supervisors. At the moment, there is no formal procedure for reporting complaints and irregularities.

The verification of compliance in Comarch is continuous. Employees are periodically trained and may use various paths to report irregularities related to non-compliance with the Comarch Code of Conduct. Other interested parties, e.g. clients, often use the opportunity to verify ethical issues in the form of meetings, audits of the other party and by collecting information through questionnaires. As a result of conducted audits in 2016-2017, but these were not separate ethical audits, no ethical irregularities were identified.

Comarch does not carry out stationary ethical audits with suppliers, however, as part of the Sustainable Development Policy for Suppliers, Comarch supports and encourages suppliers to follow ethical principles in their activities. In the survey of suppliers carried out in 2017, on a question in the survey: Does your company have implemented the Code of Conduct? "YES" was answered by 94% of companies participating in the survey. Comarch does not oblige suppliers to comply with ethical standards implemented in Comarch.

4.3. Human Rights

G4-HR4

S.7.1., S.7.2., S.7.6., S.8.1., S.8.2.

The Comarch Capital Group respects and complies with international standards regarding human rights and international labour standards, treating them as fundamental and universal. Respects and implements labour law and occupational safety and hygiene regulations, and also ensures that employees are always treated in accordance with the applicable requirements.

Recognizing the right of employees to free association, Comarch undertakes a dialogue with the elected council of employee representatives. Comarch has not identified cases in which there may be a violation of the rules or there may be a serious risk of association and collective bargaining both within the organization and among suppliers.

Comarch respect to the prohibition of discrimination due to: race, social status, ethnic origin, religion, disability, invalidity, gender, sexual orientation, relationship or political affiliation, age or marital status.

Comarch guarantees freedom of opinion, conscience and religion as well as freedom of beliefs and expression. The Comarch Capital Group promotes team work free from any prejudices and consciously derives strength and values resulting from the diversity of its employees. In return, company makes every effort to provide its employees with fair and regularly paid wages, the possibility of development, interesting and ambitious challenges and very good working conditions.

The Comarch Capital Group protects the copyrights of its employees and also, in relation to international standards, respects intellectual property as an individual good, safe from abuse.

The Comarch Capital Group respect to the prohibition of the work of children under 16, forced labour, corporal punishment, mental and physical coercion and insults, as well as the prohibition of sexual harassment, and declares the workplace to be free of such practices.

G4-HR5, G4-HR6, G4-HR12

Both Comarch S.A. as well as the Comarch Group did not identify cases of violation of human rights, child labour or forced labour, including subcontractors. No complaints about respect for human rights were received.

G4-HR2

G.4.6

Employees of the Comarch Group companies are trained in the dimension of respect for human rights and in the ethical area during *first step* training organized by the employer in the first days of work at Comarch.

Comarch SA	2017	2016
number of people participating in training	515	513
total number of training hours	515	513
% of trained employees from among newly hired	85%	85%

Comarch Capital Group	2017	2016
number of people participating in training	554	551
total number of training hours	554	551
% of trained employees from among newly hired	71%	75%

G4-HR7

The Comarch Group companies do not employ security employees directly. External companies provide security services to Comarch. So far, in security renting agreements, no record connected with training in human rights issues of a securities employees has been formalized. Works on annexes to contracts for rented security companies are underway, in which contractors will provide training for their employees with human rights issues.

4.4. Declaration of Polish Business for Sustainable Development

G4-15, G4-19

[dimensions: society, employment, environment, respect for human rights]

In May 2014, Comarch signed the "Declaration of Polish Business for Sustainable Development" and thus made assurance, that will actively work towards the development goals set out in the Vision of Sustainable Development for Polish Business 2050. The content of the Declaration is ten assumptions that will allow in the future, live with dignity and wisely use the limited resources of our Planet.

Signing of the Declaration took place with the inauguration of the 3rd Stage of the Sustainable Development Vision project for Polish Business 2050. The participants of the meeting were made aware with the proposals planned for the 3rd Stage of Vision 2050. The signatories of the Declaration have the opportunity to engage in the following working groups: social innovation, sustainable production and consumption, renewable energy sources, greening the new perspective and small and medium enterprises.

The Vision 2050 project refers to the international initiative taken by the World Business Council for Sustainable Development (WBCSD). Vision 2050 is a joint project of the Ministry of Economy, Ministry of the Environment, Responsible Business Forum and consulting company PwC. The aim of the undertaken activities is to integrate business in Poland around the idea of sustainable development, to indicate to business representatives the importance of challenges in this area and to strengthen the administration and business dialogue to develop specific solutions to support the implementation of Poland's development goals. Comarch has been cooperating with the organization of the recovery of electrical and electronic equipment for several years.

By signing the "Declaration of Polish Business for Sustainable Development," Comarch committed to:

- Support its activities for broad cooperation, innovative thinking and education of both your own employees and society,
- Conduct its business based on trust and dialogue,
- Cooperate with academic centres and schools in the field of education of future employees,
- Create conditions and development opportunities for employees,
- To promote and support the implementation of new technological solutions,
- Create infrastructure and conduct investments based on dialogue and in accordance with the principles of sustainable development,
- Take action to reduce its negative impact on the environment,
- Introduce a solution that reduce energy consumption, both in the implementation of new technological solutions, process optimization and education,
- Conduct a dialogue with the government and share its experiences on issues important to entrepreneurs and the economy,
- Raise the level of ethics in business, including in relations with all groups of stakeholders.

The risk for the above Declaration is failure to meet its assumptions. Comarch is successively striving to meet them through effective implementation of processes within the Integrated Management System and implementation of all the above-described policies.

4.5. Corporate Social Responsibility

G4-15, G4-19, G4-SO2

S.9.1., S.9.3., S.9.4., S.9.5., S.9.6.

Socially responsible business is largely based on activities for the benefit of the local community. Comarch Capital Group from the beginning of its activity has been widely involved in social activities, propagating the idea of creating a broad social platform, on the grounds of which sport and the latest IT technologies are promoted. Also important are activities that promote a healthy lifestyle and environmental protection, help animals, as well as involvement in culture and supporting initiatives of local communities.

CSR foundations in Comarch

The basis for activities in the area of corporate social responsibility is the Code of Conduct adopted and functioning in the company. The detailed CSR report in the Comarch Group is documented and presented every year in the Corporate Social Responsibility Report of the Comarch Group, which is posted on the Internet at: <https://www.comarch.com/company/corporate-social-responsibility/>.

Every year, the Comarch Group observes an increase in employee involvement in actions undertaken in the area of CSR. The email address csr@comarch.pl was created for communication, the possibility of reporting new issues in this area.

Due to the high activity of the Comarch Group in the area of corporate social responsibility, work on a comprehensive CSR policy for the Comarch Group has just begun, to regulate the issues described above.

COMARCH FOR CULTURE

Cooperation of Comarch S.A. and the St. Mary's church in Kraków under the project of revitalizing the musical space in the church.

Comarch S.A. has also made a significant donation for the renovation of organs in the St. Mary's church in Kraków and will be a co-founder of the new instrument and the entire project of revitalizing the musical space in the church. The Krakow company has been cooperating with St. Mary's church during the organization music event and has been sponsoring the St. Mary's Organ Festival - a series of summer music events in the walls of the parish church - from the very beginning of its existence.

- Comarch is increasingly implementing the policy of corporate social responsibility and is involved in activities for the protection and reconstruction of national heritage. We are a company from Krakow and we want this city to develop as a meeting place for lovers of broadly understood culture from

around the world. That is why for several years we have been supporting organ music concerts in the St. Mary's Church, which gather crowds of music lovers. The basilica is the heart and symbol of Krakow, and the bugle call played from the St. Mary's tower is heard every day by residents from all over Poland and beyond. It's time that the sound of the organs would sound with perfection due to this place - says prof. Janusz Filipiak, founder and president of Comarch S.A.

Another year in a row Comarch S.A. sponsored an event which became a part of Krakow's cultural calendar - the concert of Last Night of the Proms.

Comarch Swiss AG also supports the Polish Museum in Rapperswil in Switzerland.

COMARCH CARES GRANT COMPETITION

Two editions of the #ComarchCares grant competition were held in 2017. Teams of employees of Comarch S.A. together with the selected institution could submit competition projects supporting local communities and contributing to solving problems in such areas as: new technologies, ecology and animal protection, culture, education, sport, addiction prevention, activities for the disabled, children and youth socially excluded, seniors. Last year, four projects received grants in the amount of PLN 2,500.



CHRISTMAS COLLECTIONS FOR LOCAL COMMUNITIES

In 2017, as in 2016, employees from Polish Comarch companies in branches throughout Poland joined the organization of holiday collections for people in need.



HELP FOR ANIMALS

During annual charity campaigns, employees of Polish Comarch Capital Group companies also remember about homeless animals. In 2017, were held once again, in the headquarters of the company in Krakow and several branches in Poland, material collections for shelters or foundations to help quadrupeds. In 2017, 11 institutions throughout Poland received support.

WE MADE KRAKÓW GREEN

250 seedlings of yews were planted by Comarch S.A. employees together with their families in the Florianka Garden in the Planty Park in Krakow. The campaign organized together with the Municipal Greenery Management will be continued in the future.

FOR SENIORS

Another year in a row Comarch Healthcare SA and iMed24 Medical Centre have been engaged in activities related to activating seniors. They promote medical solutions for the elderly.

PULARIZATION OF SCIENCE

From the beginning of its activity, Comarch Capital Group has been actively cooperating with schools, universities and other educational institutions. In individual branches, employees create initiatives that involve spending time on students at dedicated courses or occasional meetings.

The company continues the program to start a career in the IT industry for students. In 2017 the 15th edition of the summer internship for students of IT and related fields was held. In addition, Comarch S.A., for the third time, joined the organization of the Małopolska Noc Naukowców (Malopolska Night of Researchers).



SPORT AND HEALTHY LIFESTYLE



During the annual "Bicycle Breakfast" event, employees who came to work by bicycle on that day received a healthy snack.

During the annual, large outdoor event for company employees and their families, sports competitions are organized. Many sporting events are also accompanied by sports activities. The Comarch Capital Group also encourages its employees to participate in outdoor sports events. Income from many of them is transferred for social purposes.

In 2017, the employees of the Comarch Capital Group companies in Poland participated in several running events in Poland, as well as volleyball and football competitions. Once again they tried their strength during Dragon Boat training.

In the summer of 2017, employees of the Comarch Capital Group companies in Poland have been able to face the training challenges of the ComarchONrun cross-country races, the ComarchONbike and ComarchONmove cycling competition for the third time.

The Comarch Recreation Centre is at the disposal of employees of the Comarch Capital Group companies in Krakow and their families.

CRACOVIA FOR CHILDREN

Helping poor children is one of the priorities of Cracovia club belonging to Comarch S.A. sport club. Footballers and hockey players not only take part in various social activities for the benefit of the youngest, but very often encourage their fans to participate in them. For this purpose, Cracovia organizes special charity events, among others: plush collection campaign for the University Children's Hospital in Krakow and Krakow's children's homes "Teddy Bear Toss", Mikołajki - Santa's gifts received nearly 500 children, "Czysty Aniołek" (Clean Angel) action - the fourth edition organized before one of the league matches, involving the collection of cleaning agents among Cracovia's fans, which went to children from the poorest Krakow families.

Cracovia cares also for the safety of its youngest fans by organizing the "Strefa Małego Pasiaka" (Little Stripes Sphere) on the stadium. There are various games for children, and children are supervised by volunteers from the "Cracovia to My" (Cracovia is Us) association. The zone is a frequent place of visit for Cracovia athletes who meet with children, give autographs and pose for photos.

CRACOVIA IN CHARITY ACTIONS FOR POOR AND PATIENTS

Cracovia also took part in projects helping the poor and the sick: "Szlachetna paczka", "Wielka Orkiestra Świątecznej Pomocy" - gadgets connected with Cracovia, including football t-shirts of football and hockey players, were transferred for a special auction.

Cracovia also supported the Family Children's Home. John Paul II, on the occasion of the anniversary of the death of John Paul II. It was carried out by Cracovia, for the second time, to collect food and cleaning products for the two Family Children's Home. John Paul II - in Chrzanów and Dursztyn.

CRACOVIA PROPAGES IDEA OF HEALTHY LIFESTYLE AMONG CHILDREN

Cracovia is also involved in actions, projects organized by other institutions or foundations to promote a healthy lifestyle and sport, such as: "Christmas Dream Cup" - in a charity football tournament involving children from children's homes, organized in cooperation with students from Krakow's universities, Rowerowy Maj (Bicycles in May) - joining the action organized by the City Hall and dedicated to young cyclists from primary and junior high schools, propagation of the idea of safe football support and promotion of sports and healthy lifestyle among children and young people - "Klasy w Pasy" (Classes in Stripes), program "Lekcja WF z Cracovią" (Lesson of PE with Cracovia)- the aim of the project is to interest children in sport and any physical activity by visiting the school of football and hockey players from the oldest sports club in Poland.

G4-SO2

Comarch does not carry out activities, which have a significant real and potentially negative impact on local communities.

S.9.1.

Comarch's operational activity does not cause a nuisance to the local community or pose a threat to its security.

The company does not have its own code of ethics in marketing communication, however, it adheres to the basic principles of ethics in the matters of responsible marketing communication. Marketing activities undertaken by Comarch do not include discriminatory content, in particular on grounds of race, religious beliefs, sex or nationality, and do not have elements that encourage violence. Comarch ads cannot mislead the recipients and must be implemented in an understandable way. Comarch's sponsorship and related agreements must be implemented in an easy-to-read and understandable way by the environment and must not violate good manners.

S.9.4.

The total amount of donations for social purposes

000' PLN	2017	2016
Comarch S.A.	1,722	31
<i>major recipients</i>	<i>The Parish of St. Mary's Basilica in Cracow</i>	<i>Anna Dymna's Foundation „Mimo Wszystko” John Paul II Centre „Nie lękajcie się”</i>
Comarch Group	1,878	84
<i>major recipients</i>	<i>The Parish of St. Mary's Basilica in Cracow Polish Museum in Rapperswil in Switzerland</i>	<i>Anna Dymna's Foundation „Mimo Wszystko” John Paul II Centre „Nie lękajcie się”</i>

S.9.5.

The total amount of donations for sponsoring

000' PLN	2017	2016
Comarch S.A.	6,600	6,600
<i>major sponsored partners</i>	<i>MKS Cracovia SSA</i>	<i>MKS Cracovia SSA</i>
Comarch Group	7,015	7,027
<i>major sponsored partners</i>	<i>MKS Cracovia SSA Football club ZUG 94</i>	<i>MKS Cracovia SSA Football club ZUG 94</i>

S.9.6.

Regardless of the activities carried out and coordinated by the company, employees of the Comarch Group engage in many charity actions (such as volunteering or Szlachetna Paczka).

4.6. Anti-corruption Practices

[dimensions: society, employment, corruption counteracting]

The Comarch Group respects the principles of fair competition, prevention of bribery, illegal payments and corruption.

G4-S07, G4-S08

No legal steps were taken regarding violations of the rules of free competition and monopolistic practices towards Comarch S.A., nor for any other company from the Comarch Group. As well as, no non-monetary sanctions for non-compliance with laws and regulations have been imposed.

The duty of employees of the Comarch Capital Group is to avoid activities leading to a conflict of interest, i.e., accepting and offering gifts as part of conducting business and commercial activities. Employees cannot pay or offer bribes or illegal benefits to civil officers or representatives of political parties in order to conclude or retain transactions. Comarch employees cannot take advantage of any benefits or help in achieving benefits from opportunities that may arise as a result of using information or position in the company.

G4-2

G.3.2.

As part of good anti-corruption practices, the following critical risks were identified:

- Risk related to non-compliance with the rules of fair competition, prevention of bribery, illegal payments and corruption,
- Risk of conflicts of interest within the scope of conducted activity,
- The risk of losing a job, imposing financial penalties and notifying law enforcement authorities,
- The risk related to the occurrence of illegal benefits for employees, business partners or other third parties (including civil officers and representatives of political parties),
- The risk related to non-compliance with legal requirements and internal procedures, regarding to the rules of corruption counteracting.

G.3.1.

Under internal regulations, employees are required to report gifts from customers and suppliers to a dedicated email address.

Internal financial and accounting processes are built based on IT systems that require multi-level decisions and verifications. Access to key data and functions is limited and supervised, and activities are logged. All this is designed to prevent unauthorized transactions by employees.

The above provisions, apart from Comarch internal regulations, are included, among others, in point V of the Code of Conduct of the Comarch Group described above. Work on the adoption and implementation of the Anti-Corruption Policy as a separate document is in progress.

G4-S03, G4-S04

S.10.1

The Group assessed its activities in terms of the possibility of corruption and takes steps to minimize the associated risks, including by implementing procedures to prevent corrupt behaviours as well as conducting training among employees

who may come across such behaviours.

G4-S05

S.10.3

No confirmed cases of corruption.

G4-S06

Comarch does not provide support to political parties, politicians and institutions of a similar nature.

S.10.2

No cases of corruption-related behaviours were reported.

4.7. Corporate Governance

G4-15, G4-19, G4-34

G.2.1., G.2.3.

Corporate governance is a set of rules of conduct, addressed both to the bodies of companies and members of these bodies, as well as to majority and minority shareholders. The corporate governance principles refer to the broadly understood management of the Company. Comarch S.A. is subject to a new set of corporate governance principles called "Good Practices of WSE Listed Companies 2016", adopted by the Warsaw Stock Exchange Board in Warsaw in 2015.

Good Practices of WSE Listed Companies is the subject of annual reports on conduct in compliance with corporate governance principles drawn up by listed companies. Attached to the annual report made public on April 27, 2018, the Management Board of Comarch S.A. submitted a report on the application of corporate governance principles by Comarch S.A. in 2017.

The Management Board and the Supervisory Board of Comarch S.A. make every effort to comply with most of the principles of Good Practices of WSE Listed Companies in the scope covered by the principle of "comply or explain" - which is based on providing the market by the company with clear information about the breach of practice. In 2017, as in 2016, Comarch S.A. did not comply with the recommendation to use the right to vote during the general meeting personally or through a proxy, outside the venue of the general meeting, using electronic means of communication. The company also does not apply a part of the policy of remuneration. Detailed information on this subject can be found in the Report regarding the acceptance of corporate governance principles in Comarch S.A. published in 2016.

G4-34

In accordance with the corporate governance principles and the Commercial Companies Code in Comarch S.A. the Supervisory Board operates together with a separate audit committee.

The Supervisory Board supervises the ongoing operations of the Company and the Group, in particular through:

- monitoring and analysing of the financial and organizational situation,
- evaluation of the strategy implementation by the Management Board,
- setting business goals for members of the Management Board and assessing their implementation,
- evaluation of the operations of selected business areas
- analysis and assessment of the risk related to the activity,
- supervision over the Export Control System,
- assessment and approval of financial statements.

The tasks of the Audit Committee cover in particular:

- supervising the reporting process and financial auditing,
- monitoring the effectiveness of internal control systems, internal audit and risk management,
- verification of the independence of the expert auditor and the entity authorized to audit financial statements.

The full text of the Report regarding the acceptance of the corporate governance principles is also available at: <https://comarch.com/investors/corporate-governance/>

4.8. Risk within Integrated Management System

G4-2

G.3.1., G.3.2.

Each of the subsystems included in the Integrated Management System Comarch covers its scope with a different subject matter and is characterized by specific risks. The Quality Management System puts a special emphasis on the risks associated with the overall functioning of the organization and its processes, documentation and relations with Suppliers. Environmental and occupational health and safety management take into account risks related to

employee issues and impact on the environment. The Internal Control System regulates the issues of international trade in goods and technologies and ensures compliance of processes with specific legal requirements. The AQAP system, concerning the implementation of projects for the armed forces, contains restrictive requirements and is built on risk management as part of ongoing projects

These risks are considered and taken into account at various levels - starting from the policies defining the main assumptions in a given field, through the procedures governing the functioning of processes, and ending with specific actions embedded in the internal mechanisms and information systems used by Comarch. The risks listed and specific mechanisms for managing them are described in the previous chapters.

Comarch is aware of the importance of identifying, analysing and dealing with risk. Currently, Comarch works on adapting the Integrated Management System to the requirements of the updated ISO standards. The new standards put special emphasis on risk-related issues - they recommend a risk-based approach to management and taking risk under consideration at the system level.

5. Contractors

G4-15, G4-EN32, G4-HR10, G4-S09

Starting from January 2017, the Contractor Management Department, which is involved in verifying and analysing contractors, has been introduced into the organizational structure of the Comarch Group.

The main competences of this department include:

- managing of the database of system counterparties operating within the Comarch Group (verification, analysis, collection of documents),
- managing of access to data and analyses of external companies from the business information industry,
- preparing of reports (a broad spectrum) about contractors of the Comarch Group for the needs of other departments or auditors,
- participating in suppliers' evaluation and selection procedures.

G4-12, G4-15, G4-EN32, G4-EN33, G4-LA14, G4-LA15, G4-HR4, G4-HR5, G4-HR10, G4-HR11, G4-S09

G.1.2., S.4.12., S.6.4., S.7.4., S.7.6., S.8.4., S.15.1., S.15.3., S.15.4.

5.1. Suppliers

The main sources of supply for Comarch S.A. and the Comarch Capital Group are international concerns, i.e. manufacturers of computer hardware and software as well as electronics, which are used for the equipment production. Most orders are made through purchases in local branches and local distribution. The activity of the Comarch Group is not dependent on a single supplier. In 2017, as in the previous year, none of the contractors provided products or services with a value exceeding 10% of the Comarch Group's sales revenues.

The Comarch Capital Group has an enormous range of products and services, of which the implementation requires cooperation with suppliers, which complement the portfolio of services and own licenses and allow the extension of the offer with third party products.

The portfolio of third-party products includes primarily well-known and internationally recognized brands and manufacturers. Comarch cooperates with suppliers mainly through local authorized distributors that help in solving of logistic problems as well as organizing of fast delivery to the customer.

Comarch's suppliers are producers of computer hardware, licensors, service providers, contractors and electronics manufacturers. The last regards the production offer of own devices developed in the Comarch Group.

The due date normally used in contracts with suppliers is 30-60 days. The Comarch Group strives to ensure that liabilities to suppliers are settled on time. As in the previous year, the rate of payments received on-time in Comarch S.A. amounted to 95% of the value of liabilities and 94% in the Comarch Group.

According to the assumptions of the suppliers analysis procedure at Comarch, the main criteria for their selection are: price, time of order fulfilment and business reputation. Additionally, in accordance with the principles of the Sustainable Development Policy for Suppliers (<https://www.comarch.pl/o-firmie/zrownowazony-biznes/polityka-jakosci/>) Comarch requires from its key suppliers compliance with the following rules:

- managing environmental impact in a responsible manner in accordance with ISO 14001 or similar standards to reduce the negative impact on the environment,
- applying occupational safety and health standards in accordance with OHSAS 18001 or a similar standard to minimize risks related to occupational hazards and prevent injuries,
- applying with understanding good business practices, social issues and environmental protection, which are related to the activities of the supplier,
- operating in accordance with applicable law,
- recognizing of employees' right to associate and collective bargaining,
- prohibiting of discrimination in all its manifestations, due to: race, social status, ethnic origin, religion impairment, disability, gender, sexual orientation, relationship or political affiliation, age or marital status,
- no employing children under 16 and on corporal punishment, mental and physical coercion, abuse and sexual harassment,
- elimination of forced labour,
- complying with the principles of the Universal Declaration of Human Rights of the United Nations.

So far, there was no special incentive plan for meeting the requirements of the Sustainable Development Policy for Suppliers. The Comarch Group acting actively for sustainable development, has however decided, that the supplier's analysis and selection procedure should be remodelled to promote those companies that are guided by principles of ethics, social responsibility and environmental protection. In 2017, a pilot comprehensive assessment program of suppliers was carried out. A detailed questionnaire was sent to selected companies concerning, first of all, compliance with ISO standards, special monitoring and supervision of production as well as meeting the quality requirements of goods.

After the pilot comprehensive assessment program of suppliers was completed, a new procedure for qualifying companies to the group of Comarch's suppliers was developed. The outcome was categorizing to suppliers based on the answers given by the companies to the questionnaire's questions about compliance with basic human and employee rights, social and environmental aspects, implemented ISO quality systems. The four categories consist of: I - chosen for cooperation in the first place, II - second order, III - reserve, IV - risky. Then, the cooperation with a given supplier is assessed: price, time of completion, meeting deadlines, the degree of fulfilment of specified requirements, quality, general terms of cooperation, including the implementation of complaints. The assessment of cooperation is obligatory for large suppliers (high volume of turnover), those who provide elements important from the point of view of medical safety, for projects subject to the requirements of AQAP, other projects recognized as strategic.

Ultimately, the results of the surveys and the supplier's assessment will be collected in the IT system, which will enable the automation of the periodic monitoring process and the generation of reports.

The awarding of categories will allow extending the criteria for selecting suppliers to carry out Comarch's orders for additional aspects related to respect for human rights, employment practices, the impact of their activities on society and the environment.

Comarch S.A. and other companies of the Comarch Group do not carry out stationary audits with suppliers in terms of compliance with health and safety rules, compliance with environmental protection regulations, counteracting discrimination, respect for human rights, in this respect counteracting child labour and forced labour.

G4-EC9**Geographical structure of suppliers.**

According to the geographical structure of operations, the Comarch Group distinguishes the following market segments: Poland, Europe-DACH, Europe-other, America and other countries. Local suppliers are defined as having their headquarters in a country where Comarch operates.

The following tables present the share of purchase values from suppliers in each location.

Suppliers of Comarch S.A. - share of purchase value from suppliers in each location			2017	2016
Poland			89%	86%
DACH			3%	3%
Europa-other			8%	9%
Americas			0%	1%
Other			0%	1%

Comarch business region - share of purchase value from suppliers in each location	Local suppliers %		Foreign suppliers %	
	2017	2016	2017	2016
Poland	98%	97%	2%	3%
DACH	50%	50%	50%	50%
Europa-other	33%	46%	67%	54%
Americas	35%	42%	65%	58%
Other	58%	51%	42%	49%

G.4.7, S.4.11., S.7.3., S.8.3., E.7.5.

The following table shows what percentage of contracts, which exceeded the turnover of PLN 100,000 in 2016 and 2017, signed by the Comarch

Group companies with software and hardware manufacturers and key subcontractors, contains standard ethical, anti-corruption, health and safety and respect for human rights regulations. The companies with which Comarch cooperates are large international corporations, which put a lot of attention to compliance with the requirements related to ethics, work safety regulations, human rights, including the prohibition of child labour or forced labour.

The following table confirms that Comarch is analysing and selecting suppliers in the way to promote those companies which in their actions are guided by the principles of ethics, social responsibility, human rights and environmental protection, which led to increase in 2017 in percentage of contracts signed by the Comarch Group companies that contained provisions typical of ethical standards, health and safety and respect for human rights.

KEY MANUFACTURERS AND SUBCONTRACTORS 2016	Ethics	Health and Safety	Human rights	Respect for the environment	Human rights including the prohibition of child labour or forced labour
Comarch SA	58.0%	35.0%	54.4%	36.1%	54.4%
Comarch Group	58.0%	35.0%	54.4%	36.1%	54.4%

KEY MANUFACTURERS AND SUBCONTRACTORS 2017	Ethics	Health and Safety	Human rights	Respect for the environment	Human rights including the prohibition of child labour or forced labour
Comarch SA	77.1%	43.3%	72.2%	46.3%	72.2%
Comarch Group	77.1%	43.2%	72.2%	46.2%	72.2%

5.2. Customers

G4-PR5

S.15.2.

Regarding the type of IT systems offered by Comarch, the main group of recipients are medium and large enterprises, which are the largest recipients of advanced IT solutions all over the world. Most Comarch products are addressed to a specific group of customers, whereas IT services, due to their universal character, are offered to each group of clients. The Comarch offer is intended for Polish and foreign clients. For many years, one of the main strategic goals of Comarch has been the development of sales of increasing number of products on foreign markets, in particular in Western Europe, Americas and Asia. The sales of the Comarch Group are highly diversified and there is no dependence on one recipient. Similarly, for Comarch Group, sales in 2017 to any of the contractors did not exceed 10% of total sales.

The most important principles of the Comarch Capital Group are: responsibility for the clients' success as well as respect and openness to their needs. Comarch provides its clients with innovative IT products of the highest quality, thanks to high skills, experience and competence of employees, cooperation with leading research and science centres both in Poland and abroad. Comarch makes every effort to ensure that the delivered IT solutions meet the highest standards and customer expectations.

Contacts with a government entities

In terms of contacts with public sector entities (central and local government administration, municipal companies, State Treasury companies, public health care centres), the provisions of the Public Procurement Act of 29 January 2004 (Journal of Laws of 2017, item. 1579 with later changes). These provisions regulate the manner of communication with the ordering party during the tender procedure, the scope of activities that may be undertaken by the parties to the proceedings and legal protection measures.

G4-PR6

Security in international business

In order to ensure control and security of foreign trade of goods, technologies and services of strategic importance for the State's security, the Comarch Capital Group has implemented an Internal Control System that ensures the application of international and domestic standards and legal requirements. Comarch does not sell products that are banned or cause controversy among stakeholders.

G4-PR5

Customer satisfaction survey

The Customer Satisfaction Survey Program is a chance for Comarch to obtain information and then to introduce improvements to ensure a high level of satisfaction from cooperation with Comarch. As part of the program, we examine the opinion of our clients about the services and products manufactured by Comarch.

The basic element of the survey is a short on-line questionnaire sent to our clients, which contains closed questions with grades 1-10 and open-ended questions. Respondents are divided into three groups of clients: management, project managers and users.

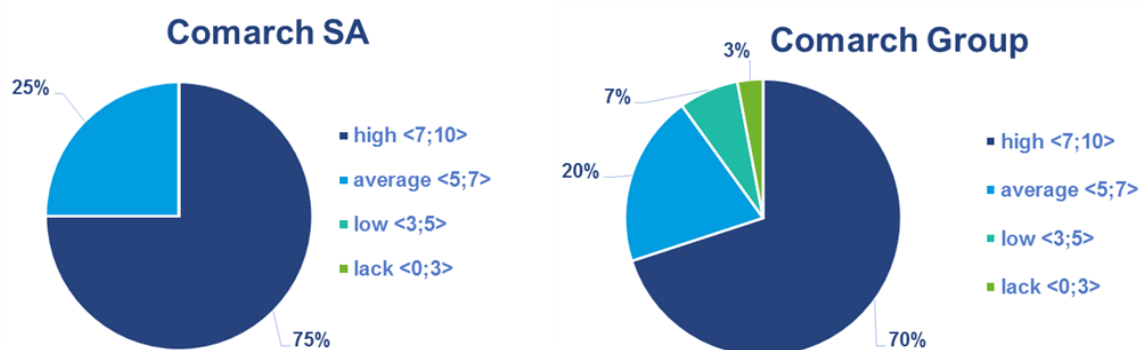
Thanks to the information obtained from the surveys, we can correctly identify and prioritize actions aimed at providing our clients with maximum satisfaction from cooperation with Comarch.

Phases of customer satisfaction survey:

- Collecting customer reviews,
- Analysing of reports,
- Determining corrective actions,
- Implementation of corrective and preventive actions,
- Verifying of the implementation of corrective and preventive actions.

The following pie graphs show how the overall satisfaction with cooperation with Comarch in 2017 was shaped. The indicator of average customer satisfaction consisted of, among others, general satisfaction with cooperation with Comarch, willingness to recommend Comarch products/services to another company, willingness to purchase Comarch products/services in the future, satisfaction with Comarch prices compared to their quality, the way how Comarch conducts business talks, negotiations and signing of contracts.

Overall customer satisfaction with cooperation with Comarch in 2017.



Scale: 1 - the customer is completely dissatisfied; 10- customer fully satisfied

Below we present the highest rated aspects of satisfaction of clients of Comarch S.A. and Comarch Group:

- High personal culture and the ability to communicate,
- Expertise of employees,
- High quality of services provided,
- Customer focus,
- Rapid response to the notification,
- Flexibility in adapting software to customer needs,
- Product quality.

5.3. Safety of Products and Consumers

G4-PR3

The information on safety of the use of the product or service, the way the product is disposed of and the environmental/social impact is required by the organization's procedures to share with the customer and to label products and services.

All medical devices manufactured by the Comarch Group are subject to assessment in terms of compliance with the essential requirements in accordance with Directive 93/42 / EEC and the Medical Devices Act of May 20, 2010 (Journal of Laws No. 107 item 679), as well as the Directive of the European Parliament. and Council 2011/65 / EU of 6 June 2011 on the restriction of the use of certain hazardous

substances in electrical and electronic equipment. In addition, all medical devices are compliant with the procedure P02-01 Risk management.

G4-PR4

In 2017 and 2016, no inconsistencies were reported regarding incorrect product labelling.

G4-PR9

Neither Comarch SA nor any other company from the Comarch Group were fined for non-compliance with laws and regulations regarding the delivery and use of products and services.

S.11.1.

There have been no instances of breaches of procedures regarding the safety of products and services.

S.11.3., S.12.3.

No penalties have been imposed on Comarch SA or Comarch Group companies for non-compliance with laws and regulations on issues related to customer safety, reliability and ethics of marketing communication.

G4-PR7

S.12.1.

The Comarch Group did not report incidents of non-compliance with regulations and voluntary codes concerning marketing communication (including advertising, promotion, sponsorship).

G4-PR8

S.13.1., S.13.2., S.13.3.

In 2017 and in 2016, no events regarding the leakage or unauthorized use of personal data (customers, employees) were identified. Comarch S.A. did not report in 2016-2017 any complaints about breaches of

customer privacy. In 2016-2017, no leakages, theft or loss of personal data were also identified. In 2017 and in 2016, there were no administrative proceedings against Comarch Group companies (e.g. GIODO - The Inspector General for the Protection of Personal Data). In 2017 and 2016, no penalties were imposed on the companies of the Comarch Group for non-compliance with laws and regulations (neither legally valid nor unlawful) on issues related to the protection of personal data.

S.11.2., S.12.2., S.14.2., S.15.5.

No proceedings were conducted by UOKIK (Office for Competition and Consumer Protection).

S.15.6.

Neither Comarch S.A. nor other Comarch companies has been punished for any anti-competitive and anti-market behaviour.

S.14.1., S.14.3.

Neither Comarch S.A. nor other Comarch companies has been subjected to any penalties related to improper product labelling. There were also no cases of non-compliance related to the incorrect labelling of the product.

6. Human Resources (Social and Labour Area)

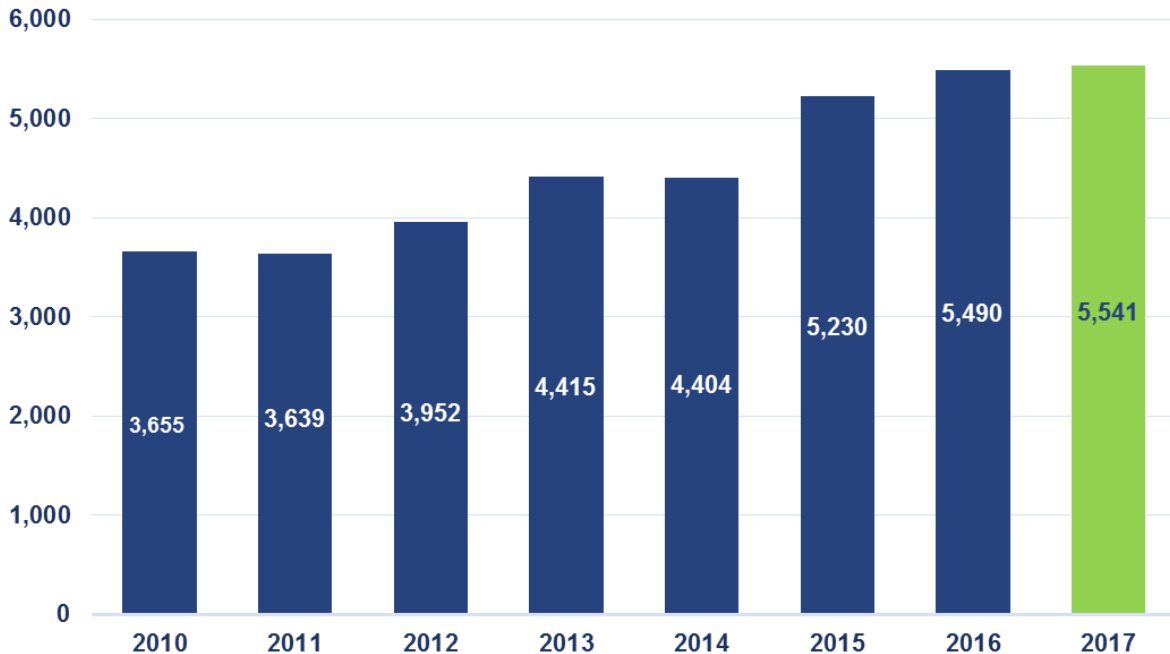
G4-LA1, G4-LA2

S.2.6., S.2.7., S.2.8., S.3.2., S.3.6.

The basic factor limiting the production capacity are human resources. To constantly invest in new products and IT technologies, the company needs employees with appropriate education and a wide range of competences. The company flexibly manages employee teams by continuously optimizing the allocation of resources in current commercial projects and internal R&D projects (construction of new products and updating of existing software not directly related to contracts with customers), using proprietary IT solutions for this purpose. As a result, the use of human resources is close to 100%. The Group diversifies the risk of restrictions on the availability of human resources by operating in 14

branches located in urban centres in Poland. As at December 31, 2017, 3,168 employees were employed in Krakow, 1,780 in other cities in Poland and 593 outside of Poland.

As at December 31, 2017 at Comarch S.A. 4,303 people were employed compared to 4,276 people employed as at December 31, 2016, while in the entire Capital Group the number of employees increased to 5,541 persons, compared to 5,490 people as at December 31, 2016.



6.1. Average Employment in Comarch Group from 2014 to 2017

G4-LA1

Average employment in Comarch S.A., from 2014 to 2017 is presented in tables below:

Average number of employees	2017	2016	2015	2014
full-time	3,492	3,416	3,121	2,678
Co-workers	844	888	860	695
Total	4,336	4,304	3,981	3,373

Average number of employees	2017	2016	2015	2014
production employees and technical consultants	3,733	3,698	3,403	2,831
marketing and sales	161	179	177	187
management and administrative	372	353	340	297
other	70	74	61	58
Total	4,336	4,304	3,981	3,373

Average employment in the Comarch Group, from 2014 to 2017 is presented in tables below:

Average number of employees	2017	2016	2015	2014
full-time	4,393	4,323	4,066	3,439
Co-workers	1,245	1,276	1,238	1,037
Total	5,638	5,599	5,304	4,476

Average number of employees	2017	2016	2015	2014
production employees and technical consultants	4369	4,342	4,104	3,438
marketing and sales	293	336	339	287
management and administrative	458	434	427	376
other	518	487	434	375
Total	5,638	5,599	5,304	4,476

Due to the constant development of its activity, both Comarch S.A. as well as the Comarch Group systematically increase the level of employment. The employment growth in 2017 was slightly lower than in previous years, which is due to a very large increase in employment in previous years.

6.2. Employment Rotation

G4-LA1

S.2.2., S.2.3.

In 2017, the rotation among employees of Comarch S.A. and the Comarch Group did not differ from the previous years and remained at the standard level for the industry. The company strives to minimize employee turnover, especially among those

key to Comarch's activity.

G4-LA16

There were no complaints regarding employment practices under the formal complaint mechanisms.

6.3. Contracts under Which Work is Provided

The dominant form of employment in Comarch S.A. and Comarch Group is employment contract. The duration of the employment contract (fixed-term or open-ended contract) depends on the employee's length of service. Other forms of employment are used only in justified cases (e.g. combining education with work).

G4-10

Total number of employees at Comarch S.A. and the Comarch Group.

Type of employment	Sex	Comarch S.A.		Comarch Group	
		2017	2016	2017	2016
Employment contract	Women	1,037	987	1,376	1,330
	Men	2,449	2,427	3,007	2,979
	Total	3,486	3,414	4,383	4,309

Other forms of employment	Women	97	107	265	253
	Men	720	755	893	928
	Total	817	862	1,158	1,181
Total		4,303	4,276	5,541	5,490

Type of employment	Sex	Comarch S.A.		Comarch Group	
		2017	2016	2017	Sex
Open-ended contract	Part Time	131	122	445	84
	Full Time	1,433	1,278	1,791	1,647
	Total	1,564	1,400	2,236	1,731
Fixed-term contract	Part Time	85	102	112	104
	Full Time	1,837	1,912	2,035	2,474
	Total	1,922	2,014	2,147	2,578
Total		3,486	3,414	4,383	4,309

Type of employment	Age	Comarch S.A.		Comarch Group	
		2017	2016	2017	2016
Open-ended contract	Under 30 years	152	135	236	171
	30-50 years	1,379	1,241	1,742	1,450
	over 50 years	33	24	140	110
	Total	1,564	1,400	2,118	1,731
Fixed-term contract	Under 30 years	1301	1287	1,444	1,518
	30-50 years	615	719	797	1,019
	over 50 years	6	8	24	41
	Total	1,922	2,014	2,265	2,578
Total		3,486	3,414	4,383	4,309

Type of employment	Age	Comarch S.A.		Comarch Group	
		2017	2016	2017	2016
Open-ended contract	Women	447	386	643	508
	Men	1,117	1,014	1,475	1,223
	Total	1,564	1,400	2,118	1,731
Fixed-term contract	Women	590	601	733	822
	Men	1,332	1,413	1,532	1,756
	Total	1,922	2,014	2,265	2,578

Other forms of employment	Women	97	107	265	257
	Men	720	755	893	924
	Total	817	862	1,158	1,181
Total		4,303	4,276	5,541	5,490

G4-EC5

In 2016-2017, all employees employed under a contract of employment at Comarch S.A. and in the Comarch Group were paid higher than the minimum wage.

G4-EC8**Significant indirect economic impact**

Workplaces created by Comarch S.A. and Polish companies of the Comarch Group in individual voivodships of Poland as at the last day of the year, all types of employment:

voivodeship	Comarch S.A.		Polish Companies of Comarch Capital Group	
	2017	2016	2017	2016
dolnośląskie	155	170	158	175
kujawsko-pomorskie	30	0	30	0
lubelskie	121	108	125	114
łódzkie	335	310	348	319
małopolskie	2,690	2,677	3,181	3,145
mazowieckie	244	257	269	292
podkarpackie	39	31	39	31
podlaskie	27	33	31	38
pomorskie	68	77	72	79
śląskie	372	378	470	491
świętokrzyskie	46	46	46	46
warmińsko-mazurskie	1	1	1	1
wielkopolskie	175	188	178	193
Total	4,303	4,276	4,948	4,924

Comarch S.A. and the Comarch Group diversifies the risk of restrictions on the availability of human resources by operating in 15 branches located in urban centres in Poland. By opening new branches and creating new workplaces, Comarch contributes to the development of the regions in which it operates. An example is Łódź, where in 2017 a modern Comarch office building was put into operation, which is located in the place where the historic Weiner factory was located. Its walls have been aesthetically integrated into the Comarch office building, resulting in a building with unique architecture and work comfort. New office space will allow to create new workplaces, which will make Łódź the second centre of Comarch in Poland in the near future.

G4-LA2**S.2.15.**

In the Polish companies of the Comarch Group, additional medical packages are a benefit available to persons employed on a contract of employment (regardless of the duration of the contract and working time). In the foreign companies of the Comarch Group, additional medical packages are provided taking into account local regulations and market practices in this regard.

G4-LA3**Indicators of returning to work and maintaining employment after maternity/paternity leave, in division by gender:**

Comarch S.A. and the Comarch Group supports employees deciding on parenthood and provides the opportunity to return to work after taking a leave related to maternity/paternity. The vast majority of employees return after their maternity/paternity leave to previously occupied positions.

Comarch S.A. and the Comarch Group enable flexible adaptation of the working time to the needs related to parenthood.

	Sex	Comarch S.A.		Comarch Group	
		2017	2016	2017	2016
The number of people who took of maternity/paternity leave	Woman	79	72	104	113
	Men	7	2	12	7
	Total	86	74	116	120
The number of people who returned to work after the maternity/paternity leave	Woman	72	60	103	78
	Man	8	0	13	4
	Total	80	60	116	82
Return to work rate ^{a)}	Woman	91%	83%	92%	82%
	Man	100%	0%	100%	57%
Number of people who returned to work after maternity/paternity leave and was still employed for 12 months after returning to work	Woman	55	54	67	64
	Man	0	2	1	8
	Total	55	56	68	72
Employment maintenance rate ^{b)}	Woman	92%	92%	88%	97%
	Man	---	100%	25%	89%

a) Return to work rate - according to the G4-LA3 guidelines, the ratio of the total number of employees who returned to work after maternity/paternity leave to the total number of employees who should return to work after maternity/paternity leave

b) Employment maintenance rate - according to the guidelines for G4-LA3, the ratio of the total number of employees who maintained their job 12 months after returning to work after maternity/paternity leave to the total number of employees returning from maternity/paternity leave in previous reporting periods

G4-LA4

The minimum period of standard notice given to employees and their selected representatives before the implementation of important operational changes that may have a significant impact on the employees of Polish companies of the Comarch Group is 4 weeks. Due to the lack of collective agreements in the Polish companies of the Comarch Group, the period of notice and the need for consultation and negotiations are not included in collective agreements. In the foreign companies of the Comarch Group, the periods of notice differ and depend on many factors, i.e. legal regulations of a given country, seniority or type of contract.

G4-EC3

Covering the organization's pension liabilities resulting from defined benefit programs

In 2017, the introduction of Employee Pension Programs in the workplace was voluntary in Poland. In the Polish companies of the Comarch Group, such program has not been implemented. Employees of some of the Comarch Group's foreign companies participate in pension programs appropriate for the given countries.

G4-LA12

Composition of management, supervisory and staff bodies in division by categories by sex and age

All representatives of the management bodies of Comarch S.A. they are Polish citizens. The division by number of supervisory authorities by diversity category:

Year	Management body	Age	Woman	Man	Total	
2017	Supervisory Board	Under 30 years	-	-	-	
		30-50 years	1	1	2	
		over 50 years	3	2	5	
		Total	4	3	7	
	Management Board	Under 30 years	-	-	-	
		30-50 years	-	6	6	
		over 50 years	-	1	1	
		Total	-	7	7	
	Total			4	10	14
	2016	Supervisory Board	Under 30 years	-	-	-
30-50 years			1	1	2	
over 50 years			3	2	5	
Total			4	3	7	
Management Board		Under 30 years	-	-	-	
		30-50 years	-	6	6	
		over 50 years	-	1	1	
		Total	-	7	7	
Total			4	10	14	

Representatives of the management bodies of the Comarch Group companies are citizens of different countries. The division by number of supervisory authorities by diversity category:

Year	Management body	Age	Woman	Man	Total
2017	Supervisory Board	Under 30 years	-	-	-
		30-50 years	1	12	13
		over 50 years	5	6	11
		Total	6	18	24
	Management Board	Under 30 years	-	-	-
		30-50 years	9	93	102
		over 50 years	4	12	16
		Total	13	123	136
	Total		19	141	160
	2016	Supervisory Board	Under 30 years	-	-
30-50 years			1	11	12
over 50 years			5	6	11
Total			6	17	23
Management Board		Under 30 years	-	-	-
		30-50 years	6	92	98
		over 50 years	4	10	14
		Total	10	102	112
Total			16	119	135

Percentage of employees divided into categories of employees employed on the basis of employment contracts by diversity category:

Comarch S.A. Categories of employees*	2017			2016		
	Woman	Man	Total	Woman	Man	Total
administration	241	57	298	221	55	276
managerial	120	415	535	109	436	545
production	622	1911	2,533	595	1877	2,472
other	54	66	120	62	59	121
Total	1,037	2,449	3,486	987	2,427	3,414

*employed on the basis of employment contracts

Comarch Capital Group	2017			2016		
	Woman	Man	Total	Woman	Man	Total
administration	364	117	481	347	107	454
managerial	151	479	630	135	492	627
production	748	2,266	3,014	728	2,237	2,965
other	113	145	258	120	143	263
Total	1,376	3,007	4,383	1,330	2,979	4,309

**employed on the basis of employment contracts*

Men constitute the dominant group among employees at Comarch S.A. and in the Comarch Group. This is in line with the specificity of the IT industry. In 2017, the number of women employed at Comarch S.A. and in the Comarch Group grew faster than the number of men employed, which resulted in an increase in the share of women in total Comarch employees. This phenomenon pertained in particular to administrative and managerial positions.

Comarch S.A.	2017				2016			
	under 30 y/o	30-50 y/o	over 50 y/o	Total	under 30 y/o	30-50 y/o	over 50 y/o	Total
administration	124	160	14	298	110	153	13	276
managerial	40	488	7	535	39	501	5	545
production	1,255	1,261	17	2,533	1,231	1,228	13	2,472
other	34	85	1	120	42	78	1	121
Total	1,453	1,994	39	3,486	1,422	1,960	32	3,414

**employed on the basis of employment contracts*

Comarch Capital Group	2017				2016			
	under 30 y/o	30-50 y/o	over 50 y/o	Total	under 30 y/o	30-50 y/o	over 50 y/o	Total
administration	211	229	41	481	173	241	40	454
managerial	82	534	14	630	47	564	16	627
production	1,515	1,395	104	3,014	1,390	1,489	86	2,965
other	106	131	21	258	79	175	9	263
Total	1,914	2,289	180	4,383	1,689	2,469	151	4,309

**employed on the basis of employment contracts*

Men constitute the dominant group among employees at Comarch S.A. and in the Comarch Group. This is in line with the specificity of the IT industry. In 2017, the number of women employed at Comarch S.A. and in the Comarch Group grew faster than the number of men employed, which resulted in an increase in the share of women in total Comarch employees. This phenomenon pertained in particular to administrative and managerial positions.

Comarch S.A.	2017				2016			
	Citizens of Poland	Citizens of other European countries	Citizens of other countries	Total	Citizens of Poland	Citizens of other European countries	Citizens of other countries	Total
administration	296	2	-	298	275	1	-	276
managerial	529	6	-	535	541	4	-	545
production	2,488	36	9	2,533	2,426	39	7	2,472
other	116	3	1	120	117	4	-	121
Total	3,429	47	10	3,486	3,359	48	7	3,414

**employed on the basis of employment contracts*

Comarch Capital Group	2017				2016			
	Citizens of Poland	Citizens of other European countries	Citizens of other countries	Total	Citizens of Poland	Citizens of other European countries	Citizens of other countries	Total
administration	418	57	6	481	394	52	8	454
managerial	187	33	5	225	589	35	3	627
production	612	261	72	945	2,613	287	65	2,965
other	2,622	86	24	2,732	188	60	15	263
Total	3,839	437	107	4,383	3,784	434	91	4,309

**employed on the basis of employment contracts*

The Comarch Group employs many employees from outside Poland, thus entering the specificity of the IT industry, where the international work environment and multiculturalism of the employee teams are the standard. The share of employees from outside Poland remained in 2017 at a level similar to last year.

S.2.9

G4-LA13

Ratio of average basic remuneration of women to average basic remuneration of men by employee category:

Categories of employees	Comarch S.A.		Comarch Group	
	2017	2016	2017	2016
administration	98%	98%	96%	93%
managerial	66%	70%	67%	72%
production	76%	76%	76%	76%
other	68%	73%	71%	75%

The average salary of women in Comarch S.A. and in the Comarch Group is lower than the average salary of men. This is mainly due to the fact that the employed women have shorter experience in the IT industry and shorter work experience in Comarch, which affects the level of remuneration. In the

group of employees, where experience in the industry and seniority are similar for women and men (administration), the level of earnings is on similar level.

G4-LA11

Employee evaluation system

The Comarch Group has a formalized employee evaluation system that ensures that the vast majority of employees receive regular assessments of their work results and information on career development opportunities.

S.2.13

The total amount of annual contributions to (The State Fund for Rehabilitation of Disabled Persons)

In 000' PLN	2017	2016
Comarch S.A.	1,843	1,336
Comarch Group	2,073	1,599

6.4. Training

G4-LA9, G4-LA10

S.5.1., S.5.2.

Comarch Training Centre is a section separated from the structures of Comarch S.A. offering specialized training as well as IT and business consultations at every level of advancement, both within internal training addressed to employees of the Comarch Group and offered to a wide range of external clients. The Training Centre uses over 20 years of Comarch experience as a knowledge-based company. Over 10,000 participants a year participate in over 300 training programs conducted by 80 qualified trainers.

In addition to specialist training, courses or workshops, the Comarch Training Centre organizes two flagship training programs related to management, dedicated to managers:

- **Comarch Akademia Zarządzania (Comarch Management Academy)** - is a training program addressed directly to the management. The aim of the program is to support the development of managerial competences. Personnel from management positions are invited to trainings (mainly the position in the organizational structure decides). Employees advancing to management positions will be regularly invited to newly formed training groups. The principle of the program is to work in a group that meets periodically in the following classes. Thanks to this, participants have the opportunity not only to confront acquired competences with practice at the workplace, but also to discuss the results achieved in the next classes. Between classes, program participants will receive additional materials and tasks to be carried out.
- **Comarch Executive Academy** (postgraduate studies for Comarch's management staff) implemented in cooperation with the Krakow School of Business of the University of Economics in Krakow. These studies are dedicated. The study program was developed jointly with the Comarch management. Classes include various issues related to the improvement of managerial competences. The study program included issues of improving the competences of launched employees, managing the development of products and services, marketing communication, shaping customer relations, sales management. The lecturers of the University of Economics in Krakow as well as external business trainers were involved in conducting the classes.

Average number of training hours per employee (by sex and employee category):

Comarch SA All trainings	2017			2016		
	managers	others	total	managers	others	total
women	13.28	11.98	12.03	16	10.69	10.87
men	23.26	12.73	13.21	22.52	11.1	11.62
Total	21.00	12.54	12.90	21.17	10.99	11.42

Internal trainings	2017			2016		
	managers	others	total	managers	others	total
women	9.06	11.93	11.82	8.44	10.35	10.29
men	9.03	12.64	12.47	8.04	10.88	10.75
Total	9.04	12.45	12.30	8.13	10.74	10.63

Comarch Group All trainings	2017			2016		
	managers	others	total	managers	others	total
women	13.18	12.04	12.08	18.16	10.81	11.05
men	22.91	12.75	13.22	22.26	11.13	11.64
Total	20.71	12.57	12.92	21.40	11.04	11.48

Internal trainings	2017			2016		
	managers	others	total	managers	others	total
women	9.04	11.99	11.87	8.43	10.49	10.41
men	9.01	12.66	12.48	8.04	10.9	10.77
Total	9.01	12.48	12.32	8.12	10.79	10.67

Number of employees raising professional qualifications who have certain rights in this respect in relation to the employer (e.g. training leave), indicating the number of employees co-financed by the employer or financing the improvement of professional qualifications:

Comarch S.A. All trainings	2017	2016	Comarch Group All trainings	2017	2016
women	1,127	1,110	women	1,142	1,137
men	3,158	3,061	men	3,178	3,088
Total	4,285	4,171	Total	4,320	4,225

Internal trainings	2017	2016	Internal trainings	2017	2016
women	180	173	women	183	179
men	589	398	men	594	406
Total	769	571	Total	777	585

Due to the lack of interest on the part of employees and the small number of people of retirement age, Comarch does not organize programs related to the end of a professional career resulting from retirement or termination of an employment contract.

6.5. Use of Public Aid and Public Orders

G4-EC4

S.1.1.

One of the main strategic goals of the Comarch Group is the development of new, competitive products that allow Comarch to further develop and, consequently, increase its value. Maintaining dynamics of sales requires expenditures on product development and their proper promotion and marketing. This applies to both modifications to existing products and technologies, as well as the development of new products. Expenditures for



research and development in 2017 reached PLN 179.4 million and thus exceeded 16% of Comarch Group's sales revenues. The Comarch Group allocated both own resources to them and actively acquired European funds. These funds are actively acquired by two Comarch Group companies - Comarch S.A. and Comarch Healthcare S.A. Expenses for research and development in Comarch S.A. in 2017 reached PLN 144.1 million.

Activities in the Special Economic Zone

Comarch S.A. conducts business activity in the Kraków Special Economic Zone "Krakowski Park Technologiczny". Due to incurred investment expenditures Comarch S.A. uses public aid in the form of income tax exemptions.

A detailed description of the investment allowances held for operating in the Special Economic Zones has been published in note 3.10 of the Consolidated Financial Statements of the Comarch Group for 2017.

S.1.2.

Sales to clients from the public sector were as below.

000' PLN	12 months of 2017	%	12 months of 2016	%
Revenue Comarch S.A.	755,517	100.0%	749,213	100.0%
<i>Including public sector</i>	31,522	4.2%	36,470	4.9%
Revenue Comarch Group	1,102,520	100.0%	1,112,813	100.0%
<i>Including public sector</i>	63,330	5.7%	72,856	6.5%

In 2017, there was a continuation of the downward trend in sales to clients from the public sector in both Comarch S.A. as well as in the Comarch Group. The decrease in Comarch S.A. amounted to PLN 4.9 million, i.e. 13.6%, which is related to the limitation of purchases by customers in this sector, caused by a temporary limitation in access to EU funding. The public sector was responsible for 4.2% of Comarch SA's revenues in this period. In the Comarch Group, a drop to clients from the public sector was PLN 9.5 million, i.e. 13.1%. The public sector was responsible for 5.7% of the Group's revenues in the discussed period.

G4-EC4

Amount of subsidies received in particular years

000' PLN	2017	2016
Comarch S.A.		
7 Framework Program (European Commission)	51	202
Structural Funds POIG (Operational Program Innovative Economy)	-	361
Structural Funds POIR (Operational Program Innovative Development)	5,558	3,583
National funds	-	-566
de minimis aid	-	-
Total	5,609	3,580
Comarch Group		
7 Framework Program (European Commission)	-166	202
Structural Funds POIG (Operational Program Innovative Economy)	-	553
Structural Funds POIR (Operational Program Innovative Development)	5,558	3,583
National funds	604	128
de minimis aid	21	179
Total	5,997	4,466

7. Health and Safety at Work

SURVEILLANCE AND INVESTIGATION SYSTEM

G4-LA6

S.4.1., S.4.2., S.4.3., S.4.4., S.4.5.

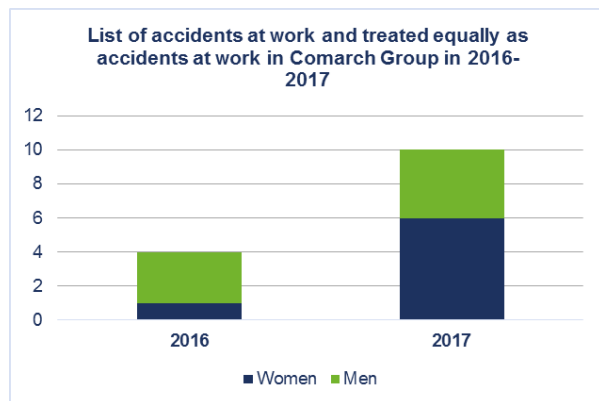
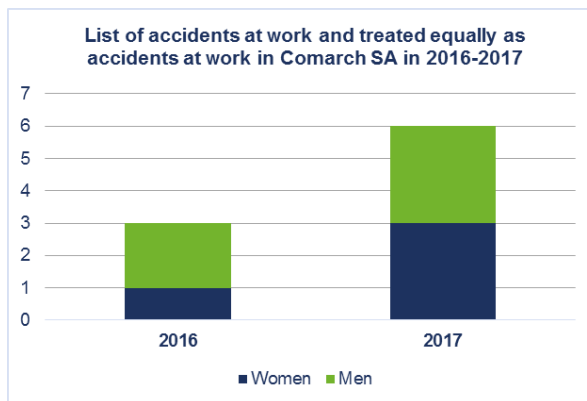
In the Polish companies of Comarch Capital Group, accidents at work are examined in accordance with the applicable regulations: Chief Health and

Safety Specialist and Employee Representative. Reports on determining the circumstances and causes of accidents are approved by the Employer. The register of accidents at work and accident documentation are subject to archiving. The method of reporting and recording accidents is described in internal procedures developed on the basis of applicable legal requirements and the Comarch practice.

In all companies of the Comarch Capital Group in the years 2016-2017, no fatal or serious accidents were recorded and there was no suspicion of occupational disease. There were also no accidents among Comarch subcontractors.

In all its branches, Comarch has a group of lifeguards with a total of about 120 people. Lifeguards are employees trained in first aid and evacuation procedures. Every 2 years trainings for lifeguards are organized, aimed at refreshing and systematizing knowledge, informing about possible changes in the standards of first aid and organizational changes in the field of evacuation. The trainings are also designed to complement the number of lifeguards. Lifeguards have at their disposal means for first aid and instructions for providing premedical help. Instructions and checklists describing the rules of conduct during evacuation were also prepared. Lifeguards are volunteers.

TYPE OF ACCIDENTS AT WORK



In 2016, there were four accidents at work which occurred in connection with work.

The causes of these accidents are related to organizational factors and the human factor. All accidents were classified as light. Two accidents did not result in inability to work, the other two accidents resulted in a total of 34 days of inability to work.

In 2017, there were 10 accidents at work.

Three of them were classified as accidents equal to accidents at work (accidents on a business trip) and occurred in circumstances that excluded a direct relationship with work. Two events were road traffic collisions, these events were caused by other road users. The third case concerned an employee of a foreign company who was on a business trip in Poland, the direct cause of the injury was slipping. These accidents led to injuries to the lower limbs and the spine. Five accidents occurred during normal business activities.

All the aforementioned accidents were classified as light, they caused a total of 98 days of incapacity to work in Comarch S.A. and 205 days in other companies of the Comarch Group respectively.

None of the accidents in 2017 was caused by technical factors or inappropriate work organization.

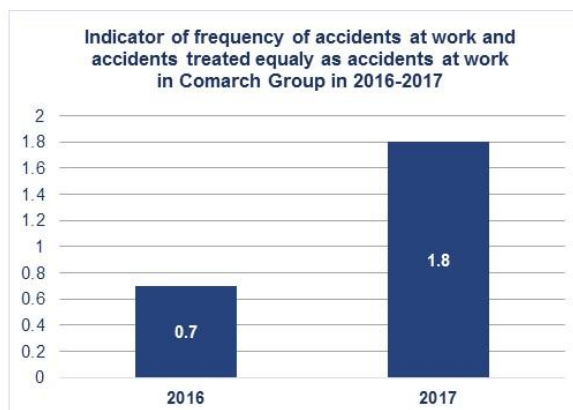
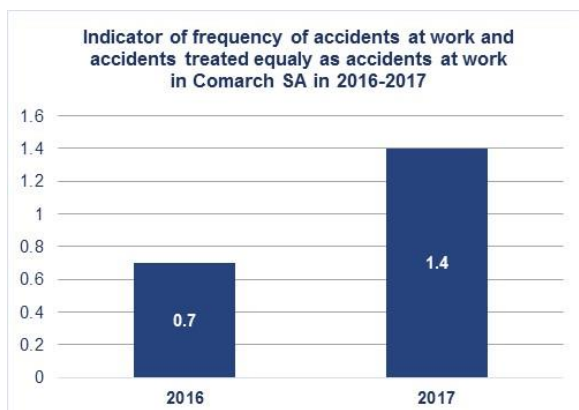
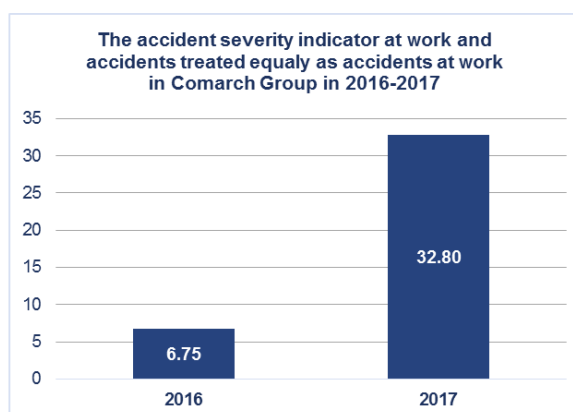
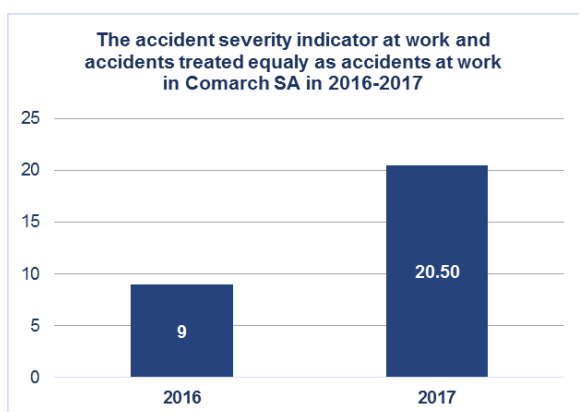
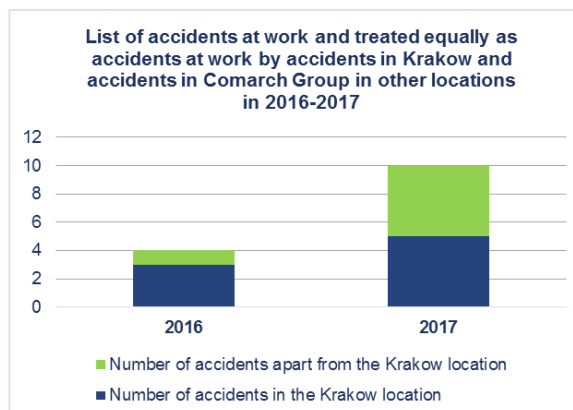
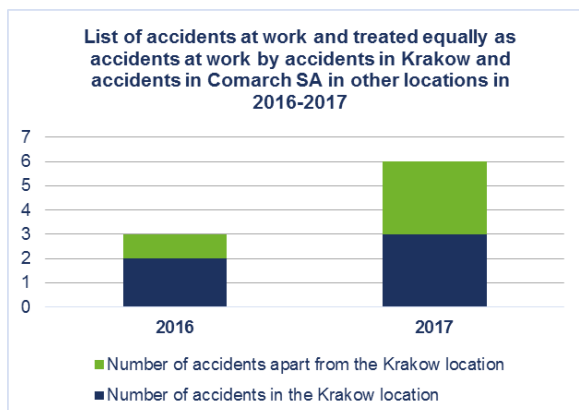
SUMMARY OF DATA CONCERNING ACCIDENTS AT WORKING IN THE YEARS 2016-2017

Comarch estimates the accident rate, i.e. the sum of accidents occurring during the year, presented by means of indicators. These indicators make it possible to compare and assess the company in terms of the size of the accident. Two measures are used: frequency and severity of accidents.

The frequency ratio is expressed as the ratio of the number of accidents to the number of persons employed, while the severity rate is the ratio of the number of lost days caused by accidental absence to the number of all accidents.

Tab.1. Indicators related to accidents at work:

Year	Number of accidents in Comarch Group	Number of accidents by sex in Comarch Group (W,M)	Number of accidents in Comarch S.A.	Number of days of absence in Comarch Group	Number of days of absence in Comarch S.A.	Frequency ratio Comarch Group	Frequency ratio Comarch S.A.	Severity ratio Comarch Group	Severity ratio Comarch S.A.
2016	4	W:1, M:3	3	37	27	0.7	0.7	6.75	9
2017	10	W:6, M:4	6	328	123	1.8	1.4	32.8	20.5



Compared to 2016, the number of accidents at work in Comarch S.A. increased by 3 while the number of employees increased by approx. 30 people.

The quantitative increase in the number of accidents in the entire Comarch Group was mainly due to the occurrence of accidents in other Group companies.

G4-LA7

S.4.6, S.4.7, S.4.8

Comarch S.A. and the companies of the Comarch Group did not report any occupational diseases. There is also no particular exposure to specific occupational diseases.

Comarch S.A. and the companies of the Comarch Group do not have work positions where there are positions with exceedances of the NDN (maximum acceptable intensity) and NDS (maximum acceptable concentration, TLV, MAC, MAK). There are also jobs with an unacceptable level of occupational risk.

G4-11, G4-LA8**S.3.1, S.3.2, S.3.3, S.3.5, S.3.6, S.4.10**

In Comarch S.A. and the Polish companies of the Comarch Group there were no trade unions created, hence in Comarch S.A. a Workers' Council was created, which operates on the basis of the Act of 7th of April, 2006, on informing employees and consulting them. Employees' representatives are selected from all employees employed under a contract of employment. The selection is made by the employees of the Company every two years. Employees' representatives take part, among others, in the analysis of accidents at work in accordance with the applicable legislation. In 2016, the employer consulted employees' representatives regarding changes to the work regulations. The changes proposed by the employer were accepted unanimously by employees' representatives. There are no collective labour agreements in the Polish companies of the Comarch Group.

In foreign companies of the capital group in the DACH region there are no trade unions. However, there are works councils. Employees choose a works council for a given location, then all employees of a given location are subject to the given works council. The works council is not mandatory, the decision on the choice of council belongs to the employees. Not all employees can participate in the election. Limitations in the selection of the council are related to work experience. The elections take place every few years, this is regulated by the provisions of the act.

Works councils in particular companies of the Comarch Capital Group in the DACH area:

Comarch Solutions AG - Innsbruck

Comarch AG - Munich

Comarch Software und Beratung AG

There are no trade unions in Comarch SRL (Italy). On the other hand, employees are subject to a national collective labour contract that was created to regulate the relations between employees and employers. Collective because it affects all employees in the contracted and national sectors, because it applies to all companies that are located in Italy. It regulates the employment relationship, e.g. schedule, qualifications and duties, remuneration, etc. Comarch SRL is subject to 'CCNL del commercio' (trade).

There are no trade unions in the other foreign companies of the Comarch Group. Some of them have sectoral agreements.

No collective disputes have been initiated in any of the companies of the Comarch Group in the last year.

G4-HR1

Every important investment agreement in both Comarch S.A. as well as in the Comarch Group is analysed in terms of the existence of records regarding compliance with human rights. These contracts were concluded only in EU countries where the risk of violation of human rights is low. In every important investment agreement concluded in 2016 and 2017, there was a clause requiring the contractor to maintain basic human rights. The agreement for the purchase of fixed assets or intangible assets necessary for conducting business operations with a unit value of over PLN 10 million is considered a valid investment agreement.

8. Environmental Protection

The environmental policy and procedures operating under the Integrated Management Systems oblige Comarch S.A. to take active actions to reduce the negative impact on the natural environment. As part of the implemented Environmental Management System compliant with the requirements of ISO 14001, Comarch identified environmental aspects that it monitors, supervises and influences.



The Comarch Group adheres to local legal regulations in the field of environmental protection. Comarch purposefully limits the impact of its operations on the natural environment, minimizing the use of natural resources and limiting the generation of waste generated as a result of ongoing operations. It also promotes an ecological lifestyle among its employees by running campaigns that encourage active participation in environmental protection, such as the voluntary signing of the "green declaration" by Comarch employees.

E.4.1., E.4.2., E.4.3., E.4.4.

Naturally valuable areas are not located in the neighbourhood or sphere of Comarch's influence. Comarch's activities do not cause significant environmental losses.

Comarch monitors air pollution on a current basis with a sensor installed on one of the buildings in the Special Economic Zone in Kraków. The sensor is included in the Airly network which helps to create a national smog monitoring network.

8.1. The Use of Natural Resources

G4-EN1, G4-EN2

E.1.1., E.1.2.

Due to the fact that Comarch S.A. is a producer of software and information systems, the operations of the Company do not involve the direct use of raw materials that are natural resources such as ores, minerals, wood. Instead, it uses typical media consumed in the course of its current work. Among the raw materials used, there were identified: electricity, gas, fuels (gasoline and diesel), heat energy and water.

A part of the Comarch Group's operations is also low-series production of electronic devices from subassemblies bought outside, as well as related design and research works. Production takes place in a modern production hall located in the Special Economic Zone in Krakow. In the above production, as well as in research and development works in this area, minimal amounts of process materials are used, such as epoxy, cyanoacrylate, methacrylic and derivatives (maximum 1 litre per year), tin (maximum several kilos per year), fluxes (maximum 1 kilogram per year), degreasing substances, e.g. IPA and others (in the amount of several litres per year), etc. As part of the Integrated Quality Management System, the company keeps a register of chemical substances.

Due to the fact that Comarch S.A. manufactures and launches electronic devices from components manufactured and delivered by third parties, the company is unable to analyse in detail the composition of the components used for production and indicate whether their individual elements are made of renewable or non-renewable materials.

The remaining companies of the Comarch Group also do not directly use primary raw materials.

In addition, in the course of production processes, paper, cardboard, plastic and wooden packaging and security are used. The following there is a summary of the quantities of packaging placed on the market. The increase in the number of packaging introduced results directly from increased sales of products.

Packages introduced to the market	2017	2016
COMARCH S.A.	1,316 kg	1,006 kg
Comarch Group	3,221 kg	2,308 kg

8.2. Finished Goods

The way of impact on the environment

Electronic devices produced by the Comarch Group are powered by electricity and thus affect the environment. The amount of energy consumed by the company's products is not possible to accurately estimate, because it depends on many factors on which the company does not influence, among others from the intensity of use, weather conditions, operating mode and the type of accessories attached to the devices. The electronic devices manufactured by the Comarch Group after a period of operation become waste and may also affect the environment.

Description of policies

At the stage of creating products, in order to limit their impact on the natural environment, the Comarch Group sets itself one of the main goals to reduce the consumption of electricity in each subsequent version of a given device.

Another way to reduce the impact of manufactured devices on the environment is the application of the provisions of EU WEEE Directive 2002/96 / EC of the European Parliament and of the Council of 27 January 2003 on waste electrical and electronic equipment. The devices manufactured by the Comarch Group are appropriately marked as devices that must be disposed of properly after their use. Pro-ecological activities related to a product that will become a waste in the future are not limited to the proper marking. Many years of activities and care for the environment have resulted in a number of initiatives related to the design of equipment, including:

- development of products for which it is possible to modernize thanks to the construction enabling the introduction of corrections,
- development of reusable products after a period of operation thanks to the construction enabling easy disassembly of the device into components and after its possible re-use (servicing) repair.

The designed devices also meet the requirements of the RoHS (Restriction of Hazardous Substances) (2002/95 / EC) directive, thanks to which the use of hazardous substances in a product that could penetrate the natural environment has been limited.

Indicators

The measures of achieving the goal related to the reduction of energy consumption are:

- increase in the share of power supplies with a higher energy efficiency class,
- decrease of the average power consumed by devices measured in the mode of operation with the highest power demand.

Measures of compliance with the WEEE and RoHS directives are compliance declarations available for each device.

G4-EN7

The currently manufactured CardioVest device has introduced features related to limiting the negative impact on the environment, including the use of a power supply with VI class of energy efficiency (the highest class), reduction of energy consumption through changes in the software of the device and the development of a packaging that is light and made of paper that can be recycled. The device meets the requirements of RoHS and WEEE.

One of the objectives of the strategy for the coming years is the development of a new version of the CardioVest device, in which hardware changes and software changes will be introduced to further reduce energy consumption by, among others, introducing device elements that are not used at any given time.

E.8.2

Revenues from products and services related to them, developed with regard to environmental criteria

	2017	2016
Comarch SA	0.6%	0.3%
Comarch Group	0.5%	0.7%

The low ratio is the effect of a small share of sales of electronic devices in total revenues. The Group mainly produces non-material products and provides services.

8.3. Energy

G4-EN3, G4-EN5, G4-EN6

E.2.1., E.2.2., E.2.3.

The Comarch Group constantly monitors the consumption of electricity, heat and fuels in all areas of its operations, focusing primarily on electricity and gas used in buildings owned by Comarch S.A. and on the consumption of liquid fuels used to drive cars belonging to the Comarch fleet.

The Data Centre in Kraków, Warsaw, and in Dresden and Lille have a significant share in the electricity consumption.

All Comarch facilities are modern buildings with electricity and heat management systems. In buildings owned by Comarch (including SSE buildings in Kraków, buildings in Warsaw and Łódź), fluorescent lamps for those created in LED technology are gradually replaced and more modern and energy-saving devices are introduced.

From 2015, Comarch S.A. uses ecological energy as part of the Tauron Eko Biznes offer, under which the purchased electricity, in whole or in part, is produced in the so-called high-efficiency cogeneration, or the process of joint generation of electricity and heat, thereby reducing CO2 emissions to the atmosphere.

The dynamics of development, establishing long-term cooperation with contractors from around the world, and therefore the creation of new jobs means the necessity to expand programming centres all over Poland, and thus increase Comarch's energy needs.

In March 2016, Comarch S.A. commenced the construction of a modern investment - an office building SSE7 located in the Special Economic Zone in Krakow, within the campus belonging to Comarch at ul. Michał Życzkowski in Krakow. The completion and settlement of the building took place at the beginning of 2018. The building has an underground garage, ground floor, 4 utility floors and a technical floor on the building's roof. The total number of users will reach up to 2,500 people.

The building was designed with attention to ecology. It is planned to obtain the BREEAM Very Good certificate. The building offers a number of facilities, including contact of all work rooms with direct daylight, possibility of airing all office rooms by opening windows, a large amount of greenery, access by bike paths, as well as internal and external spaces for recreation and rest. In addition, due to the concern for the natural environment, photovoltaic cells will be installed on the roof of the building, used to partially cover their own electricity demand and possible resale of excess energy produced to the power grid. Battery charging stations have been installed in the underground garages of the building, which will enable employees to use ecological electric vehicles. A distinguishing feature are the light shelves, designed on the southern and western elevations. The light shelves have a dual function: on the one hand, they shade the window from the sun, on the other they reflect the light, illuminating the part of the office space located deep in the tract.

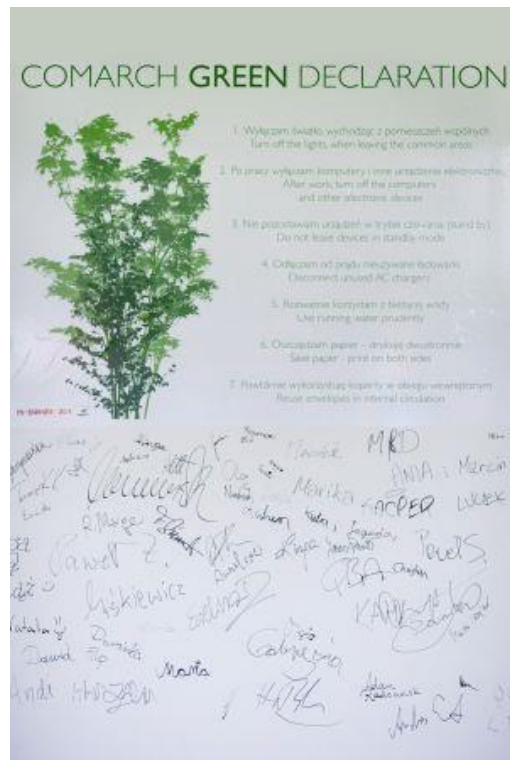


G4-15

Every year, environmental programs are prepared, defining goals and actions limiting negative environmental impacts and raising employee awareness.

Many Comarch employees have signed a voluntary "green declaration" containing principles that compliance helps to care for the environment. These rules are formulated and adapted to the company so that they can be used by Comarch employees without any problems.

- I turn off the light, starting from the common rooms,
- I turn off computers and other electronic devices after work,
- I do not leave devices in standby mode,
- Disconnecting unused chargers from the power supply,
- I use running water carefully,
- I save paper - I print double-sided,
- I reuse envelopes in the internal circuit.



Electricity, heat, gas and fuel consumption Comarch S.A.	2017	2016
Electricity consumption ¹⁾	16,606,000 kWh	15,233,774 kWh
Heat consumption ²⁾	4,903,000 MJ	4,728,000 MJ
Gas consumption ³⁾	401,292 kg	391,150 kg
Gasoline consumption ⁴⁾	314,051 kg	287,955 kg
Diesel oil consumption ⁵⁾	63,339 kg	60,855 kg
Total energy consumption ⁶⁾	103,697,244 MJ	96,669,722 MJ
Energy consumption/employee	24,099 MJ/employee	22,608 MJ/employee

- 1) Electricity consumption is presented for buildings located in Poland owned by Comarch, i.e. buildings in the Special Economic Zone (SSE1, SSE2, SSE3, SSE4, SSE5, SSE6), two buildings in Warsaw (at Puławska street and at Leśna street). The total electricity consumption for these buildings is presented. Electricity consumption in 2017 was higher by approx. 8.3% compared to 2016. The increase results from the expansion of the Data Centre in Warsaw and Kraków.
- 2) Heat consumption is presented for buildings located in Poland owned by Comarch, i.e. buildings in the Special Economic Zone (SSE1, SSE5, SSE6) and the building in Warsaw at ul. Puławska. The total heat consumption for these buildings is shown. Heat consumption in 2017 was higher by approx. 3.5% compared to 2016. Growth is low and may result from local climatic conditions.
- 3) Gas consumption is shown for buildings located in Poland owned by Comarch, i.e. buildings in the Special Economic Zone (SSE2, SSE3, SSE4), and buildings in Warsaw (at Puławska Street and at Leśna Street). The total gas consumption for these buildings is shown. Gas consumption is given in kg using the following factor for calculations: 1m3 gas = 0.75kg. Gas consumption in 2017 was higher by approx. 2.5% compared to 2016. Growth is low and may result from local climatic conditions.

- 4) The consumption of gasoline and diesel oil is presented for:
- gasoline: the total consumption of gasoline for the car fleet in Poland and the fuel used in low-speed equipment is presented,
 - diesel oil: the total consumption of diesel oil for the car fleet in Poland and the oil used in machines and aggregates used for emergency salting is presented.

Fuel consumption is given in kg using the following factors for calculations: 1 litre of gasoline = 0.73421 kg, 1 litre of diesel = 0.83752 kg. The consumption of gasoline in 2017 increased by about 9%, and diesel consumption by about 4%, as compared to 2016. The increase is a direct result of the increase in the number of vehicles in the Comarch car fleet and increase in the intensity of vehicle use caused by the company's constant expansion.

- 5) The consumption of electricity, heat, gas and fuels (gasoline and diesel oil) presented above has been taken into account in calculating the total energy consumption within the organization. The following coefficients were used for the calculations: 1 kg of gas = 14.75 kWh, 1 kg of gasoline = 13.1 kWh, 1 kg of oil = 12.69 kWh. Total energy consumption has been converted into MJ. The total energy consumption in 2017 amounted to 103 697 244 MJ and increased by approx. 7.2% compared to 2016, due to the increase in electricity, heat, gas and gasoline consumption. The intensity of energy consumption was also calculated taking into account the number of employees in buildings owned by Comarch. According to the data as at 31 December 2017, 4,303 employees were employed, which represents an increase in employment by 27 persons compared to the corresponding period of 2016. The energy consumption per person in 2017 amounted to 24,099 MJ, so it increased by approx. 6% compared to 2016.

Electricity, heat, gas and fuel consumption in the Comarch Group ⁵⁾	2017	2016
Electricity consumption	19,492,351 kWh	17,282,659 kWh
Heat consumption	7,646,400 MJ	7,823,800 MJ
Gas consumption	408,141 m ³	398,864 m ³
Gasoline consumption	382,574 kg	357,185 kg
Diesel oil consumption	146,244 kg	145,706 kg
Total energy consumption	124,391,724 MJ	114,544,020 MJ
Energy consumption/ employee	22 445 MJ/employee	20,838 MJ/employee

- 6) Data have been presented taking into account the companies of the Comarch Group (domestic and foreign).

8.4. Comarch Cars

G4-EN21

The car fleet is gradually being exchanged for vehicles that meet the European emission requirements. The Comarch Group is gradually modernizing the car fleet. In 2016, Polish companies purchased over 60 new cars (including more than 50 in Comarch SA) meeting strict EURO6 emission standards, including 6 ecological hybrid vehicles (2 in Comarch S.A., 4 in other Group companies). In the following year - 2017, the number of new vehicles exceeded 140 items (including 115 items in Comarch SA), the number of hybrid vehicles increased to 11 (including 6 items in Comarch SA). Thus, in 2016 and 2017, the appropriate number of older, less economical and less environmentally friendly cars was replaced. Ecological issues (fuel consumption, exhaust emission standards) constitute an important criterion for the selection of cars to the Comarch fleet. In addition, starting from 2016, employees of Polish Comarch Group companies take part in theoretical and practical courses on eco-driving, i.e. economic and eco-driving. So far 48 employees took part in them.

Emission standards	Cars in Comarch SA	
	2017	2016
EURO 6	66%	40%
EURO 5	31%	48%
EURO 4 and lower	3%	12%

In foreign companies, most cars also meet the EURO 6 emission standard. In 2016-2017, a total of 20 new cars were purchased (12 in 2016 and 8 in 2017) by modernizing the fleet and increasing the number of vehicles with more environmentally friendly propulsion units.

Emission standards	Cars in Comarch Group	
	2017	2016
EURO 6	65%	40%
EURO 5	32%	48%
EURO 4 and lower	3%	12%

8.5. Water

G4-EN8, G4-EN9, G4-EN10

E.3.1., E.3.2., E.3.3.

Comarch's activity does not involve water consumption for technological purposes. Water supplied entirely by municipal water pipes is used only in hygienic and sanitary rooms from living purposes. Comarch does not take surface water directly and does not discharge sewage into waters and lands.

Significant impact on the level of water consumption in the Kraków SEZ has a recreation centre functioning there, which includes a 25-meter swimming pool.

Water consumption is subject to continuous monitoring in the form of readouts from sub-meters. As part of activities aimed at minimizing consumption, employees' awareness is increased, actions are taken to increase the speed and efficiency of responding to various types of failures.

Water consumption in Comarch S.A.	2017	2016
Water consumption	32,629 m ³	31,145 m ³
Water consumption per 1 employee	7.58 m ³	7.28 m ³

Water consumption in Comarch Group	2017	2016
Water consumption	41,241 m ³	39,732 m ³
Water consumption per 1 employee	7.44 m ³	7.23 m ³

Water consumption is shown for Comarch's buildings located in Poland, i.e. buildings in the Special Economic Zone (SEZ1 - SEZ6), two buildings in Warsaw (at Puławska street and at Leśna street).

Additionally, the table on water consumption in the Comarch Group presents the total water consumption including buildings owned by other Comarch Group companies in Poland and abroad.

The total water consumption for these buildings is shown. The year-on-year water consumption is at a similar level. Differences may result from investment processes conducted during this period. In new buildings rainwater is collected in retention reservoirs, which is then used for irrigation of greenery. Comarch does not reuse previously processed water.

8.6. Emissions

G4-EN15, G4-EN16, G4-EN18, G4-EN20, G4-EN21

E.5.1., E.5.3.

Comarch constantly strives to minimize the negative impact of operations on the environment. Therefore, from 2012 the emission of carbon dioxide equivalent to the environment is estimated. During the estimation, a methodology was used to multiply the data on energy consumption, water and fuel by appropriate emission conversion factors. These converters allow the exchange of these data to the equivalent of carbon dioxide (CO₂e). CO₂e is a universal unit of measure that allows you to estimate the impact on global warming resulting from greenhouse gas emissions. The following are the estimated direct values (resulting from the operations of the organization) and indirect (from any other activities, e.g. electricity consumption, water) of the carbon dioxide emissions for the base year.

Direct greenhouse gas emissions in Comarch S.A.	2017	2016
Emission of CO ₂ e	2,453 Mg CO ₂ e	2,599 Mg CO ₂ e
Emission of CO ₂ e/person	0.57 Mg CO ₂ e /person	0.61 Mg CO ₂ e /person
Emission of CO ₂ e/ unit of revenue*	3.25 CO ₂ e	3.47 CO ₂ e

Direct greenhouse gas emissions in Comarch Group	2017	2016
Emission of CO ₂ e	2,934 Mg CO ₂ e	3,092 Mg CO ₂ e
Emission of CO ₂ e/person	0.44 Mg CO ₂ e /person	0.47 Mg CO ₂ e /person
Emission of CO ₂ e/ unit of revenue*	2.66 CO ₂ e	2.78 CO ₂ e

*PLN 1,000,000

To calculate the direct emission of greenhouse gases, data on the consumption of fuels (gasoline and diesel) as well as natural gas for buildings owned by Comarch SA in Poland were used. In 2016, unorganized HFC hydrofluorocarbons emissions from leakage in refrigeration and air conditioning systems were also added. During the calculations, the indicators developed by the organization DEFRA - Greenhouse Gas Conversion Factor Repository, KOBIZE, RTE France, ISE Germany for 2016 and 2017 were used. In addition, data from the analysis of the database of the Central Registry of Operators were used in the calculation of HFC emissions. Direct emission of greenhouse gases for Comarch S.A. in 2017 amounted to 2,453 Mg CO₂e, which is a decrease of approx. 5.6% compared to 2016. Such a significant decrease results from the introduction of regular leak testing of refrigeration and air conditioning equipment. The level of total CO₂e emissions per one employee decreased by 6.3% y / y.

Total greenhouse gas emissions at Comarch S.A. (direct and indirect jointly)	2017	2016
Emission of CO ₂ e	15,573 Mg CO ₂ e	14,507 Mg CO ₂ e
Emission of CO ₂ e/person	3.62 Mg CO ₂ e/person	3.39 Mg CO ₂ e/person

Total greenhouse gas emissions at Comarch Group (direct and indirect jointly)	2017	2016
Emission of CO ₂ e	17 589 Mg CO ₂ e	16 373 Mg CO ₂ e
Emission of CO ₂ e/person	3,17 Mg CO ₂ e/person	2,98 Mg CO ₂ e/person

In order to calculate the intensity of greenhouse gas emissions, the direct and indirect greenhouse gas emissions of the organization have been summed up. Total greenhouse gas emissions for Comarch S.A. in 2017 amounted to 15,573 MgCO₂e, an increase of approx. 7% compared to 2016. The intensity of greenhouse gas emissions was also calculated, taking into account the number of employees in buildings owned by Comarch S.A. According to the data as at December 31, 2017, 4,303 people were employed, which is an increase in employment by 27 people compared to the same period in 2016. The total greenhouse gas emissions per person in 2017 was 3.62 Mg CO₂e, so it increased by 6.3% compared to 2016.

G4-EN17

Not applicable.

G4-EN30

Comarch, while caring for both the environment and reducing costs associated with transport, shortens the supply chain by applying the principle of delivery directly from the distribution point to the end user or business partner, wherever it is possible, i.e. where no interference is required to perform configuration, installation on the equipment or such interference would still take place in the end-user's location.

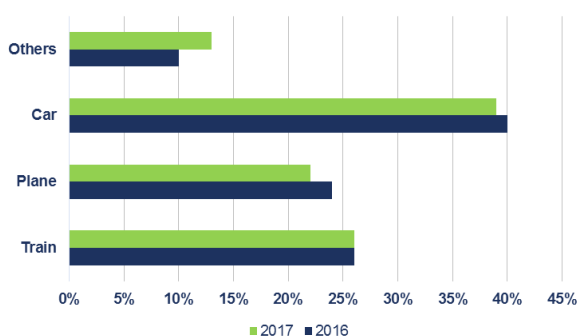
A significant reduction in the impact of transport of goods and products is also possible thanks to the use of collective transport - courier companies.

Transportation organized and carried out by means of own means of transport by employees of Comarch S.A. are sporadic.

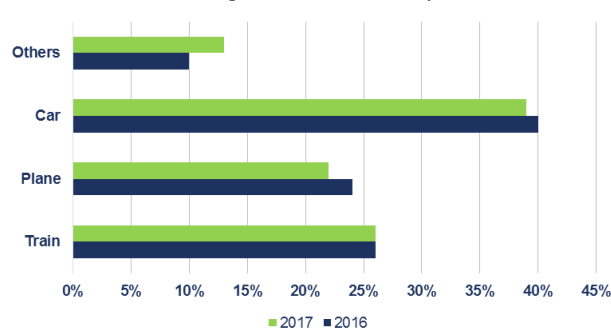
Because Comarch has a very large group of recipients, who are medium and large enterprises from all over the world, the number of business delegations carried out by Comarch employees is counted in thousands.

The number of delegations is systematically growing due to the fact that every year the number of clients is expanding and new branches of the company are opening up. The most common means of transport used by Comarch employees (most often during domestic delegations) are cars and rail transport. Foreign air transport dominates in foreign delegations. Public transport, bus and taxi were included in the remaining means of transport.

The use of means of transport during domestic and foreign delegations in Comarch S.A.



The use of means of transport during domestic and foreign delegations in Comarch Group



G4-EC2, G4-EN19

Reduction of greenhouse gas emissions

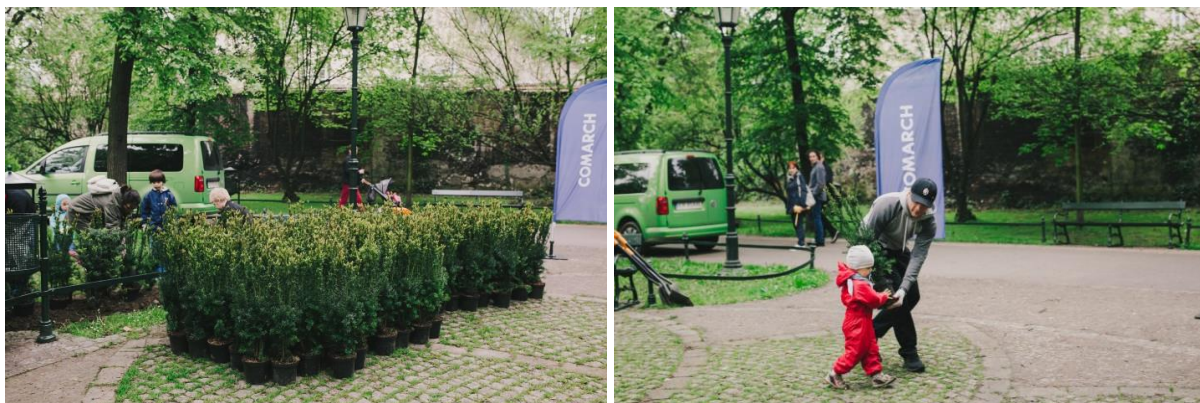
Climate changes do not have direct implications for the operations of the Comarch Group, nevertheless, Comarch takes active steps to improve the state of the natural environment.

Activity related to the reduction of direct greenhouse gas emissions carried out in 2016-2017:

- systematic maintenance and modernization of installations containing hydrofluorocarbons (HFCs). The reduction of emissions in relation to 2016 amounts to 206.7 MgCO₂e. Calculations made on the basis of the CRO database and indicators indicated in the Kyoto Protocol.

- current implementation of energy-saving solutions (replacement of light sources with LED lighting).
- gradual replacement of vehicles for vehicles with lower fuel consumption.

The tree planting campaign organized in 2015 in cooperation with the Municipality of Greenery in Krakow was a symbolic proof of the concern of the Comarch Group for the natural environment. Employees of the Comarch Group planted 300 yards at the Grzegórzeckie Roundabout in Kraków. Similar actions will be organized both in 2017 and in subsequent years.



G4-EN20

Emissions of substances that deplete the ozone layer (ODS)

In 2016, installations containing ODS were removed. Substances have been recovered and disposed of by authorized entities.

ODS emissions are monitored on the basis of the CRO (Central Register of Operators) database. All air-conditioning and fire-fighting equipment containing gases that deplete the ozone layer are registered in it. The register contains information about inspections and possible gas additions.

G4-EN21

E.5.2., E.5.4.

Emissions of nitrogen oxides, sulphur oxides and other significant emissions to air

Comarch S.A.	2017	2016
Emission of CH ₄	4.65 Mg CH ₄	4.36 Mg CH ₄
Emission of CH ₄ /unit of revenue*	0.0062 Mg CH ₄	0.0058 Mg CH ₄
Emission of N ₂ O	3.78 Mg N ₂ O	3.57 Mg N ₂ O
Emission of N ₂ O CH ₄ / unit of revenue *	0.0050 Mg N ₂ O	0.0048 Mg N ₂ O
Comarch Group	2017	2016
Emission of CH ₄	5.39 Mg CH ₄	5.11 Mg CH ₄
Emission of CH ₄ /unit of revenue*	0.0049 Mg CH ₄	0.0045 Mg CH ₄
Emission of N ₂ O	6.24 Mg N ₂ O	6.09 Mg N ₂ O
Emission of N ₂ O CH ₄ / unit of revenue *	0.0057 Mg N ₂ O	0.0054 Mg N ₂ O

*PLN 1,000,000

Significant air pollutants generated by organizations taken into account are CH₄ and N₂O generated from the combustion of fuels. In calculations, the consumption of natural gas and fuels (gasoline and diesel oils) were taken into account. The calculations developed by the organization Greenhouse Gas Conversion Factor Repository for 2017 were used for the calculations. The data provided are estimates.

For Comarch S.A. the CH₄ emission in 2017 was 4.65 Mg CH₄, an increase compared to 2016 by approx. 6.7%. The N₂O emission in 2017 amounted to 3.78 Mg of N₂O, which is an increase by approx. 5.8% as compared to 2016. As mentioned earlier, the increase may result from local climatic conditions, increase in the intensity of car fleet operation and slight increase in employment in this period.

G4-EN22

E.6.5

Comarch S.A. is a producer of municipal sewage (household). Activity of Comarch S.A. and Comarch Group companies does not generate industrial wastewater.

G4-EN24

There were no significant leaks in the reporting period.

G4-EN25

Comarch does not transport, process or cross-border waste recognized as hazardous.

G4-EN26

Comarch does not generate sewage discharged directly into water reservoirs, thus, Comarch's activities have no negative impact on protected areas and habitats.

G4-EN27

The products manufactured by Comarch do not have a significant negative impact on the natural environment during use. The impact on the natural environment of introduced electronic products at the end of their life cycle depends mainly on customer behavior in this area. Comarch provides collection of used electronic and electrical equipment. More information at: <https://www.comarch.pl/o-firmie/srodowisko/wprowadzanie-oraz-zbieranie-sprzetu-elektrycznego-i-elektronicznego/>

G4-EN28

Percentage of recovered materials from sold products and their packaging by material category

In all companies of the Comarch Group subject to the obligation, the level of collection of waste electrical and electronic equipment in 2016 and 2017 was 40% of the mass of products sold. The minimum recovery level was 75%. The calculations were made on the basis of the Act of 11 September 2015 on waste electrical and electronic equipment (Journal of Laws of 2015, item 1688). The obligation was implemented by the Biosystem S.A. Recovery Organization.

For Comarch S.A. and Comarch Healthcare S.A. the recovery level of the introduced packaging in 2016 and 2017 was at least 61%. The calculations were made on the basis of the Act of 13 June 2013 on the management of packaging and packaging waste (consolidated text, Journal of Laws of 2013, item 888, as amended). The obligation was performed by the Biosystem S.A. Recovery Organization.

The remaining companies of the Comarch Group paid the product fee in accordance with the applicable requirements.

G4-EN31

Investments related to environmental protection

The largest investment of the Comarch Group that has an impact on environmental protection is the construction of the SSE7 office building in the Krakow Special Economic Zone. The building was designed with care for the natural environment and ecology. Photovoltaic panels with a total power of 64 kW have been installed on the roof of the building. Photovoltaic cells from which photovoltaic panels are built convert solar energy into electrical energy. This will allow for partial coverage of own electricity demand and possible resale of excess energy produced to the grid without additional CO₂ emission to the atmosphere. Plant designers assume that it will bring annual savings due to electricity consumption, allowing for a 10-year return on investment.

In order to reduce energy consumption, the following were also used in the SSE7 office building:

- Light shelves on the east and west façades fulfil a dual function: on the one hand, they shade the window from the sun, on the other they reflect the light, illuminating the part of office space located in the deep part of the road,
- Building Management System (BMS) with automation: a system that integrates ventilation, air conditioning, heating, lighting, access control, power supply (UPS), burglary and robbery, allowing for efficient and optimal building management and media consumption,

- The BMS system has already been implemented in the Comarch SA office building in Łódź put into use in the first quarter of 2017.

In addition, air conditioners are modernized on a day-to-day basis to be more environmentally friendly, fluorescent lamps are gradually replaced with those created in LED technology and more modern and energy-saving devices (EnergyStar) are installed.

Additional expenses for environmental protection were related to the costs of ensuring the obligations to collect, recover and recycle introduced electronic equipment, packaging, batteries and waste management. The summary is presented in the table below.

Expenditure on environmental protection in the scope of waste utilization, recycling and recovery of introduced products	2017	2016
Comarch S.A.	2,865 PLN	2,848 PLN
Other companies in Comarch Group	13,035 PLN	9,502 PLN

8.7. Waste

G4-EN22, G4-EN23

E.6.1., E.6.2., E.6.3., E.6.4., E.6.5.

Comarch has implemented waste management procedures. Waste is collected in a selective manner and

prevents their negative impact on the natural environment. In the field of transport and disposal of waste, Comarch cooperates only with authorized entities that have technical means and administrative decisions allowing management of waste transferred in a manner safe for people and the natural environment.

Below is a table showing the amount of waste generated and transferred in 2016 and in 2017 by the Comarch Group companies. The largest percentage share in the waste stream produced by Comarch is waste electronics. This waste, according to Polish legislation, is subjected to the process of recycling and recovery in waste treatment installations of companies collecting waste.

In 2016, in addition to waste generated at the head office in Krakow, waste generated at the location in Katowice was also monitored (in connection with renovation and relocation to a new location).

Comarch Healthcare S.A. is a manufacturer of medical waste generated in the results of its operations. The waste is transported and disposed of by authorized entities.

As a result of catering activities run by the company canteen OPSO Sp. z o.o. waste from the fat separator is generated.

Hazardous waste has been marked with the symbol "*" in the table, masses are given in megagrams.

Significant amounts of waste have been marked in bold, the residual weight of the waste is given jointly for the group's companies. All companies of the Capital Group annually report the amount of waste generated to the appropriate local Marshal Offices.

Comarch is a producer of municipal sewage, which is entirely directed to municipal sewage treatment plants. There is no separate quality and quantity records of the wastewater thus generated.

Type of waste	Code of waste	The amount of waste generated and transferred in 2017 (locations in Poland)	The amount of waste generated and transferred in 2016 (locations in Poland)
Discarded devices containing Freons, HCFCs, HFCs	16 02 11*	-- Mg	0.041 Mg
Worn out devices containing dangerous elements other than those mentioned in 16 02 09 to 16 02 12	16 02 13*	0.411 Mg	0.352 Mg
Waste equipment other than those mentioned in 16 02 09 to 16 02 13 - electronic scrap	16 02 14	10,900 Mg	7,538 Mg
Items removed from used devices, other than those mentioned in 16 02 15 - printing toners from office equipment	16 02 16	0.05 Mg	0.185 Mg
Other batteries and accumulators	16 06 05	0.013 Mg	0.047 Mg
Mixed construction, renovation and disassembly wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	17 09 04	--	2,090 Mg
Medical waste (Comarch Healthcare S.A.)	18 01 03*	3,227 Mg	2,535 Mg
Large-size waste <i>*hazardous waste</i>	20 03 07	-- Mg	0.725 Mg

Level of compliance with regulations

Comarch has implemented the procedure of identification and access to legal requirements. At least once a year an assessment of compliance with the applicable legal requirements and other requirements adopted for use by Comarch is carried out. The results of the assessment are presented in the documentation prepared for the review of the Integrated Management System and presented to the Management Board.

G4-EN29

E.7.3., E.7.4.

In the reporting period Comarch S.A. and the Comarch Group companies have not been subject to significant financial penalties and non-financial sanctions for non-compliance with environmental protection regulations.

G4-EN24

In the reporting period, Comarch Group companies did not receive any complaints regarding environmental impact under the formal complaint mechanisms.

E.7.2.

There were no environmental failures in the reporting period.

G4-EN34

In the reporting period, Comarch Group companies did not receive any complaints regarding environmental impact under the formal complaint mechanisms.

As part of cooperation with external entities, actions were undertaken dedicated to employees, under which employees could return used electrical and electronic equipment, including large-size equipment. At the same time, waste paper collection was carried out. Currently, waste containers are placed in Comarch facilities. Employees can return used electrical and electronic equipment on an ongoing basis; additionally, they can dispose of used batteries and fluorescent lamps.

From November 2014, Comarch is a member of the Polish Chamber of Commerce for Environmental Protection, which brings together entrepreneurs being waste recovery organizations and entrepreneurs introducing packaging, products in packaging as well as electrical and electronic equipment to the market.

E.7.1., E.7.2.**Not applicable.**

9. Assessment of the Significance of Aspects for the Environment

The significance of particular aspects for the Comarch Group (unless otherwise indicated) is defined as follows:

Category	Aspects	Significance of Aspects	Indicators by GRI
Economic	Economic Performance	High /medium/low	G4-EC1, G4-EC2, G4-EC3, G4-EC4
	Market Presence	High /medium/low	G4-EC5, G4-EC6
	Indirect Economic Impacts	<u>High</u> /medium/ low	G4-EC8
	Procurement Practices	High /medium/low	G4-EC9
	Materials	<u>High</u> / medium /low	G4-EN1, G4-EN2
	Energy	<u>High</u> / medium /low	G4-EN3, G4-EN5, G4-EN6
	Water	<u>High</u> / medium /low	G4-EN7, G4-EN8, G4-EN9, G4-EN10
Environmental	Emissions	<u>High</u> / medium /low	G4-EN15, G4-EN16, G4-EN17, G4-EN18, G4-EN19, G4-EN20, G4-EN21
	Effluents and Waste	<u>High</u> / medium /low	G4-EN22, G4-EN23, G4-EN24, G4-EN25, G4-EN26
	Products and Services	<u>High</u> / medium /low	G4-EN27, G4-EN28
	Compliance	<u>High</u> / medium /low	G4-EN29
	Transport	<u>High</u> / medium /low	G4-EN30
	Overall	<u>High</u> /medium/ low	G4-EN31
	Supplier Environmental Assessment	<u>High</u> /medium/ low	G4-EN32, G4-EN33
	Environmental Grievance Mechanisms	<u>High</u> / medium /low	G4-EN34
	Employment	High /medium/low	G4-LA2, G4-LA3
	Labour/Management Relations	<u>High</u> / medium /low	G4-LA4
Human Rights	Occupational Health and Safety	High /medium/low	G4-LA6, G4-LA7, G4-LA8
	Training and Education	<u>High</u> / medium /low	G4-LA9, G4-LA10, G4-LA11
	Diversity and Equity Opportunity	<u>High</u> / medium /low	G4-LA12
	Equal Remuneration for Women and Men	<u>High</u> / medium /low	G4-LA13
	Labour Practices Grievance Mechanisms	<u>High</u> /medium/ low	G4-LA14, G4-LA15

	Supplier Assessment for Labour Practises	<u>High</u> /medium/ low	G4-LA16
	Human Rights	<u>High</u> / medium /low	G4-HR1, G4-HR2
	Non-discrimination	<u>High</u> / medium /low	G4-HR3
	Freedom of Association	<u>High</u> /medium/ low	G4-HR4
	Child Labour	<u>High</u> / medium /low	G4-HR5
	Forced or Compulsory Labour	<u>High</u> / medium /low	G4-HR6
	Security Practises	<u>High</u> /medium/ low	G4-HR7
	Supplier Human Rights Assessment	<u>High</u> /medium/ low	G4-HR10, G4-HR11
	Human Rights Grievance Mechanisms	High /medium/low	G4-HR12
	Local Communities	<u>High</u> / medium /low	G4-SO2
Society	Anti-corruption	<u>High</u> / medium /low	G4-SO3, G4-SO4, G4-SO5
	Public Policy	<u>High</u> / medium /low	G4-SO6
	Anti-competitive Behaviour	<u>High</u> / medium /low	G4-SO7
	Compliance	<u>High</u> / medium /low	G4-SO8
	Supplier Assessment for Impacts on Society	<u>High</u> / medium /low	G4-SO9, G4-SO10
	Grievance Mechanisms for Impacts on Society	<u>High</u> / medium /low	G4-SO11
Product Responsibility	Customer Health and Safety	<u>High</u> / medium /low	G4-PR1, G4-PR2
	Product and Service Labelling	<u>High</u> / medium /low	G4-PR3, G4-PR4, G4-PR5
	Marketing Communications	<u>High</u> /medium/ low	G4-PR6, G4-PR7
	Customer Privacy	High /medium/low	G4-PR8
	Compliance	<u>High</u> / medium /low	G4-PR9

10. G4-GRI Content Index (General Standards)

G4-32

Indicator GRI-G4	Disclosures	Placement in the Report (page number)
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Strategy and Analysis

G4-1	STATEMENT FROM THE MOST SENIOR DECISION-MAKER OF THE ORGANIZATION (SUCH AS CEO, CHAIR, OR EQUIVALENT SENIOR PERSON) ABOUT THE RELEVANCE OF SUSTAINABILITY TO THE ORGANIZATION AND THE ORGANIZATION'S STRATEGY FOR ADDRESSING SUSTAINABILITY.	3
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Organizational Profile

G4-2	DESCRIPTION OF KEY IMPACTS, RISKS, AND OPPORTUNITIES	14,15,17,18,19, 20,28,29
G4-3	THE NAME OF THE ORGANIZATION.	4
G4-4	THE PRIMARY BRANDS, PRODUCTS, AND SERVICES.	4
G4-5	THE LOCATION OF THE ORGANIZATION'S HEADQUARTERS.	4
G4-6	THE NUMBER OF COUNTRIES WHERE THE ORGANIZATION OPERATES, AND NAMES OF COUNTRIES WHERE EITHER THE ORGANIZATION HAS SIGNIFICANT OPERATIONS OR THAT ARE SPECIFICALLY RELEVANT TO THE SUSTAINABILITY TOPICS COVERED IN THE REPORT.	5,6
G4-7	THE NATURE OF OWNERSHIP AND LEGAL FORM.	4,5
G4-8	THE MARKETS SERVED (INCLUDING GEOGRAPHIC BREAKDOWN, SECTORS SERVED, AND TYPES OF CUSTOMERS AND BENEFICIARIES).	5,6
G4-9	THE SCALE OF THE ORGANIZATION.	5,6,9
G4-10	THE TOTAL NUMBER OF EMPLOYEES.	37
G4-11	THE PERCENTAGE OF TOTAL EMPLOYEES COVERED BY COLLECTIVE BARGAINING AGREEMENTS.	51
G4-12	THE ORGANIZATION'S SUPPLY CHAIN.	30
G4-13	ANY SIGNIFICANT CHANGES DURING THE REPORTING PERIOD REGARDING THE ORGANIZATION'S SIZE, STRUCTURE, OWNERSHIP, OR ITS SUPPLY CHAIN	6
G4-14	WHETHER AND HOW THE PRECAUTIONARY APPROACH OR PRINCIPLE IS ADDRESSED BY THE ORGANIZATION.	4,14
G4-15	EXTERNALLY DEVELOPED ECONOMIC, ENVIRONMENTAL AND SOCIAL CHARTERS, PRINCIPLES, OR OTHER INITIATIVES TO WHICH THE ORGANIZATION SUBSCRIBES OR WHICH IT ENDORSES.	12,13,22,23,29, 30,56
G4-16	MEMBERSHIPS OF ASSOCIATIONS (SUCH AS INDUSTRY ASSOCIATIONS) AND NATIONAL OR INTERNATIONAL ADVOCACY ORGANIZATIONS.	4
Identified Material Aspects and Boundaries		
G4-17	ALL ENTITIES INCLUDED IN THE ORGANIZATION'S CONSOLIDATED FINANCIAL STATEMENTS OR EQUIVALENT DOCUMENTS.	6
G4-18	THE PROCESS FOR DEFINING THE REPORT CONTENT AND THE ASPECT BOUNDARIES.	12
G4-19	ALL THE MATERIAL ASPECTS IDENTIFIED IN THE PROCESS FOR DEFINING REPORT CONTENT.	12,13,22,24,29
G4-20	THE ASPECT BOUNDARY WITHIN THE ORGANIZATION.	-
G4-21	THE ASPECT BOUNDARY OUTSIDE THE ORGANIZATION.	-
G4-22	THE EFFECT OF ANY RESTATEMENTS OF INFORMATION PROVIDED IN PREVIOUS REPORTS, AND THE REASONS FOR SUCH RESTATEMENTS.	8
G4-23	SIGNIFICANT CHANGES FROM PREVIOUS REPORTING PERIODS IN THE SCOPE AND ASPECT BOUNDARIES.	8

Stakeholders Engagement

G4-24	A LIST OF STAKEHOLDER GROUPS ENGAGED BY THE ORGANIZATION.	11
G4-25	THE BASIS FOR IDENTIFICATION AND SELECTION OF STAKEHOLDERS WITH WHOM TO ENGAGE.	11
G4-26	THE ORGANIZATION'S APPROACH TO STAKEHOLDER ENGAGEMENT, INCLUDING FREQUENCY OF ENGAGEMENT BY TYPE AND BY STAKEHOLDER GROUP.	11
G4-27	KEY TOPICS AND CONCERNS THAT HAVE BEEN RAISED THROUGH STAKEHOLDER ENGAGEMENT, AND HOW THE ORGANIZATION HAS RESPONDED TO THOSE KEY TOPICS AND CONCERNS, INCLUDING THROUGH ITS REPORTING.	12

Report Profile

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G4-29	DATE OF MOST RECENT PREVIOUS REPORT (IF ANY).	8
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G4-31	THE CONTACT POINT FOR QUESTIONS REGARDING THE REPORT OR ITS CONTENTS.	-
G4-32	GRI CONTENT INDEX.	67
G4-33	THE ORGANIZATION'S POLICY AND CURRENT PRACTICE WITH REGARD TO SEEKING EXTERNAL ASSURANCE FOR THE REPORT.	8

Governance

G4-34	THE GOVERNANCE STRUCTURE OF THE ORGANIZATION, INCLUDING COMMITTEES OF THE HIGHEST GOVERNANCE BODY. IDENTIFY ANY COMMITTEES RESPONSIBLE FOR DECISION-MAKING ON ECONOMIC, ENVIRONMENTAL AND SOCIAL IMPACTS.	29
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Ethics and Integrity

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11. G4-GRI Content Index (Particular Standards)

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G4-EC2	FINANCIAL IMPLICATIONS AND OTHER RISKS AND OPPORTUNITIES FOR THE ORGANIZATION'S ACTIVITIES DUE TO CLIMATE CHANGE	60
G4-EC3	COVERAGE OF THE ORGANIZATION'S DEFINED BENEFIT PLAN OBLIGATIONS	40
G4-EC4	FINANCIAL ASSISTANCE RECEIVED FROM GOVERNMENT	47,48

G4-EC5	RATIOS OF STANDARD ENTRY LEVEL WAGE BY GENDER COMPARED TO LOCAL MINIMUM WAGE AT SIGNIFICANT LOCATIONS OF OPERATION	39
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G4-EC7	DEVELOPMENT AND IMPACT OF INFRASTRUCTURE INVESTMENTS AND SERVICES SUPPORTED	-
G4-EC8	SIGNIFICANT INDIRECT ECONOMIC IMPACTS, INCLUDING THE EXTENT OF IMPACTS	39
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G4-SO11	NUMBER OF GRIEVANCES ABOUT IMPACTS ON SOCIETY FILED, ADDRESSED, AND RESOLVED THROUGH FORMAL GRIEVANCE MECHANISMS	-
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12. Overview of SIN (Non-financial Reporting Standards)

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I. Management Area (G)		
G.1.1.	DESCRIPTION OF THE ADOPTED DEVELOPMENT STRATEGY WITH REGARD TO SOCIAL AND ENVIRONMENTAL ASPECTS	4
G.1.2.	CHARACTERISTICS OF THE ADOPTED BUSINESS MODEL, INCLUDING THE DESCRIPTION OF THE SUPPLY CHAIN, WITH SPECIAL VERSION OF THE DESCRIPTION OF SOCIAL AND ENVIRONMENTAL IMPACT	4,30
G.2.1.	DESCRIPTION OF THE MANAGEMENT STRUCTURE, CONTAINING INFORMATION IF ANY AND WHAT IS THE APPROACH TO MANAGE NON-FINANCIAL (SOCIAL, ENVIRONMENTAL ASPECTS) ASPECTS,	14,29

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G.2.2.	LIST OF MANAGEMENT SYSTEM CERTIFICATES (e.g. ISO 9001, ISO 14001, OHSAS 18001)	13,15
G.2.3.	DESCRIPTION OF THE INTERNAL CONTROL SYSTEM, WITH INDICATED MONITORING OF SOCIAL AND ENVIRONMENTAL ASPECTS OF ACTIVITY	29
G.3.1.	DESCRIPTION OF THE APPROACH TO RISK MANAGEMENT AND INCLUSION OF SOCIAL AND ENVIRONMENTAL ASPECTS	14,15,17,18,19,20,28,29
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G.4.2.	NUMBER OF ETHICAL AUDITS COMPLETED WITH SUPPLIERS, NUMBER OF AUDITS ENDED IN THE IDENTIFICATION OF IRREGULARITY	20
G.4.3.	NUMBER OF ETHICAL AUDITS COMPLETED IN THE ORGANIZATION ON THE REQUEST BY ITS RECIPIENTS, NUMBER OF AUDITS COMPLETED WITH THE IDENTIFICATION OF IRREGULARITY	21
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II. Environmental Area (E)

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