

## COMARCH SA EXPORT CONTROL SYSTEM POLICY

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Comarch is a global provider of comprehensive business IT solutions designed to support relations with clients and to optimize operations and business processes. Technological progress and rapidly growing competition generate new challenges for software, implemented IT systems and goods being traded. The need to meet these requirements carries the risk that products delivered by Comarch can be dual use items and may be used in violation of national and international legal regulations. To prevent such practices, Comarch has implemented an Export Control System in conformance with Art. 11(2) of the Act of 29 November 2000 on foreign trade in goods, technologies and services of strategic importance of national security and for the maintenance of international peace and security (as amended). Export Control System is certified by PCBC S.A. – entity authorized to certify conformity and control the functioning of the export control system under the Minister of Economy Regulation of 12.04.2013 (OJ 2013, item. 525).

Within the Export Control System, Comarch SA is obligated to adhere to the following rules:

- ensuring that no profits are earned in violation of the Export Control System restrictions,
- restraining from trading goods or services in violation of domestic or international law,
- prevent transactions with counterparties involved in the proliferation of weapons of mass destruction,
- ensuring strict adherence to provisions of the Export Control System in all positions involved with trading goods and services,
- ensuring the supervision of the Transaction Control Officer over all export control processes.

Any behavior of the company's employee, who violates the mandatory Export Control System provision is treated as a violation of a work duties and is subject to disciplinary actions according to Comarch SA internal rules of employment as well as criminal responsibility on the basis of the Act of 29 November 2000 on foreign trade in goods, technologies and services of strategic importance for national security and the maintenance of international peace and security (as amended).

The Export Control System in Comarch SA is being supervised by a commissioner nominated by the board of directors. The person holds the function of the Export Control Officer within the Export Control System.

By understanding, implementing and applying the Export Control requirements, Comarch joins in the international efforts to maintain world peace and security.

Cracow, 29 May 2020

President of Comarch SA

