

COMARCH



Comarch S.A. and Comarch Group Consolidated Non- Financial Data Statement for 2022

Kraków, 28th of April, 2023

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we carry out projects all over the world in over 70 countries on 6 continents



PLN 1,859 million
of sales revenue



PLN 108 million
of net profit attributable to shareholders



60
companies in the Comarch Group



7,9%
net margin



6,800+
professional employed

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

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 is 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.

Regardless of the formal requirements, Comarch has been using good practices in the field of non-financial reporting for many years. 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 Group regarding sustainable development. In the opinion of the Management Board of the Comarch S.A., 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, increasing awareness of diversity among management and employees, as well as improving suppliers' management procedures. The Comarch Group constantly conducts activities to protect the natural environment, invests in its own renewable energy sources and promoting pro-ecological attitudes among the crew. Last year, the Comarch Group was actively involved in helping refugees from Ukraine and was invariably a patron of culture, art and sport, supporting local initiatives, local government and non-governmental organizations, health care units and charity campaigns.

The year 2022 was full of many challenges, such as the war in Ukraine, tense international situation, price shocks on energy markets, high inflation and rising financing costs. For many enterprises, these conditions were not conducive to doing business and normalizing the situation after two previous "epidemic" years. The Comarch Group also proved in this situation that it is very well prepared to operate in crisis conditions, regardless of their causes. The Comarch Group, due to very good financial situation, significant product, industry and geographic diversification, the ability to efficiently adapt to a rapidly changing environment and thanks to the high commitment of its employees, is able to carry out its mission of disseminating innovative technical thought created in Poland around the world, to the satisfaction of customers, employees, shareholders and the entire socio-economic environment.

The Management Board of Comarch S.A. points that the Non-Financial Information Statement includes non-financial information regarding Comarch S.A. and the Comarch Capital Group. The statement was prepared in accordance with the requirements of non-financial reporting included in the Accounting Act of 29th September, 1994, European Commission guidelines on Directive 2014/95/EU on reporting on non-financial information and on the basis of the National Non-Financial Information Standards (SIN) issued by the Reporting Standards Foundation. The disclosure of KPI data was also made in line with Regulation (EU) 2020/852 of the European Parliament and of the Council of the 18th of June, 2020 on the establishment of a framework to facilitate sustainable investment (EU Taxonomy). This report includes data for 2022 and comparative data for 2021. No

significant adjustments were made to the information contained in previous reports. This report is not subject to certification or external verification by professional auditors.

Management Board of the Comarch S.A.

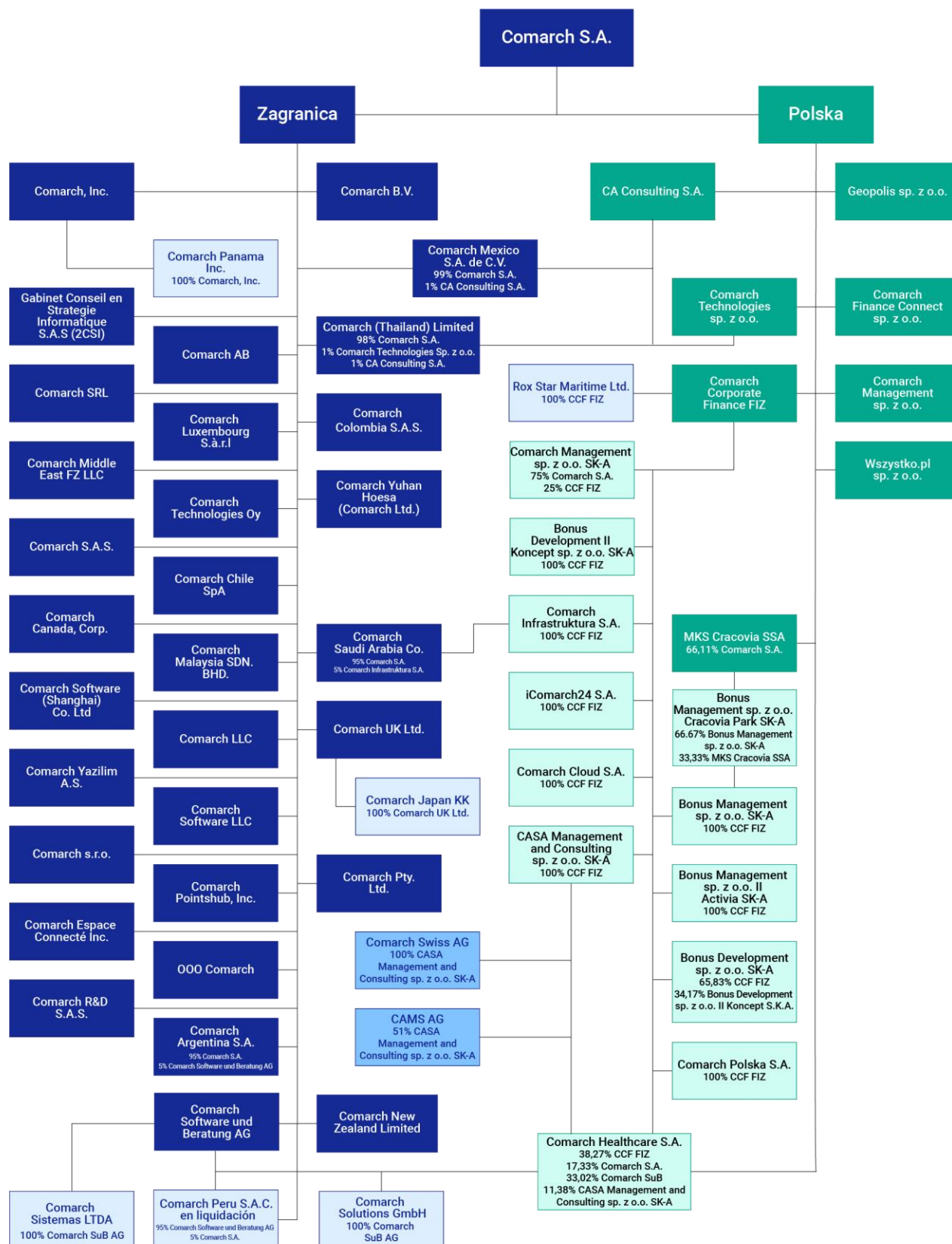
2. Information about Comarch Capital Group

2.1. Structure, Shareholders and Activities of the Company

Structure of Comarch Group

G.1.1., G.1.2.

The Consolidated Financial Statement of the Comarch Group for 12 months of 2022 includes the statements of the following companies. This Non-Financial Information Statement covers all entities of the Comarch Capital Group included in the Consolidated Financial Statement. The structure of the Comarch Group is presented below.

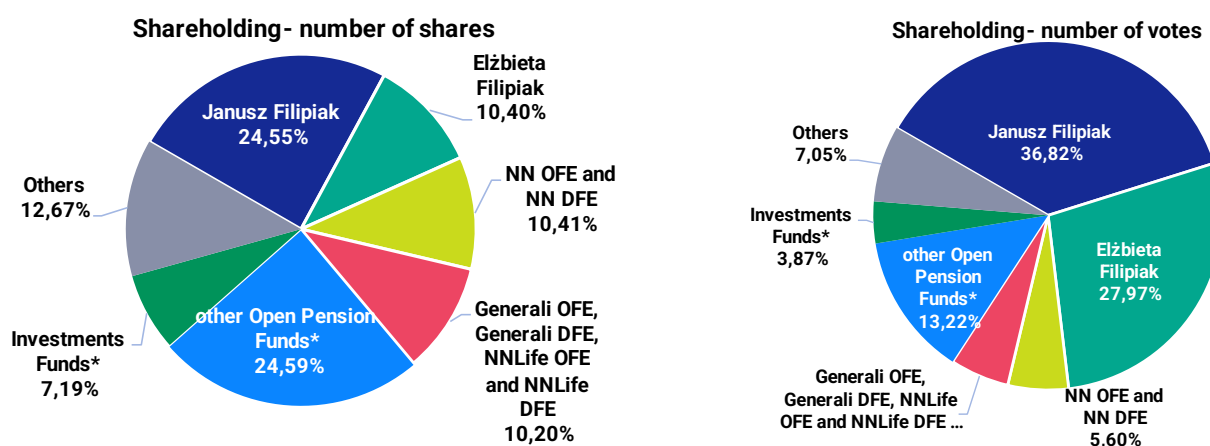


100% Comarch S.A., unless otherwise indicated.

Shareholders and Activities of the Company

The basic activities of the Comarch Group, in which Comarch S.A. with its registered office in Krakow at Al. Jana Pawła II 39 A is a Parent Company, include activity related to software, PKD 62.01.Z. The registration court for Comarch S.A. is the District Court for Krakow Śródmieście in Krakow, The Eleventh Economic Division of the National Court Register. The company's KRS number is 0000057567. Comarch S.A. holds the dominant share in Group regarding realised revenues, value of assets and number and volume of executed contracts. Comarch S.A. shares are admitted to public trading on the Warsaw Stock Exchange. The duration of the Parent Company is not limited.

The charts below show 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 28th of April, 2023.



*) on the basis of data published by open pension funds and investment funds as at 31.12.2022



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 and maintenance 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.

The Comarch Group focuses on developing IT solutions in the service model - Comarch is one of the market leaders in this area. Last year, the Comarch Group had a comprehensive offer for Comarch Cloud, with the highest security standards, based on the Comarch Data Centre infrastructure. Thanks to Comarch Cloud, customers can use the software, store data and run their businesses without the need to have their own IT infrastructure, while having high performance, reliability, security and scalability ensured.



A detailed description of the products and services provided was included in point 3 of the Statement of Comarch S.A.'s Management Board regarding the activities and Statement of Comarch S.A.'s Management Board regarding the activities of the Capital Group.

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 activity.

As at the date of publication of the statement, Comarch S.A. has 21 locations, including branches in Poland, the Comarch Group consists of 60 companies located on 5 continents, in 35 countries, in over 100 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, Asia, Oceania and North America. In the previous year, Comarch Software Spain S.L.U. en liquidación was liquidated and a merger agreement between Comarch Software und Beratung AG with Comarch AG was concluded, as a result of which Comarch SuB took over the rights and obligations of Comarch AG. For 2023, further capital investments are planned both 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 2022.

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

60
Companies

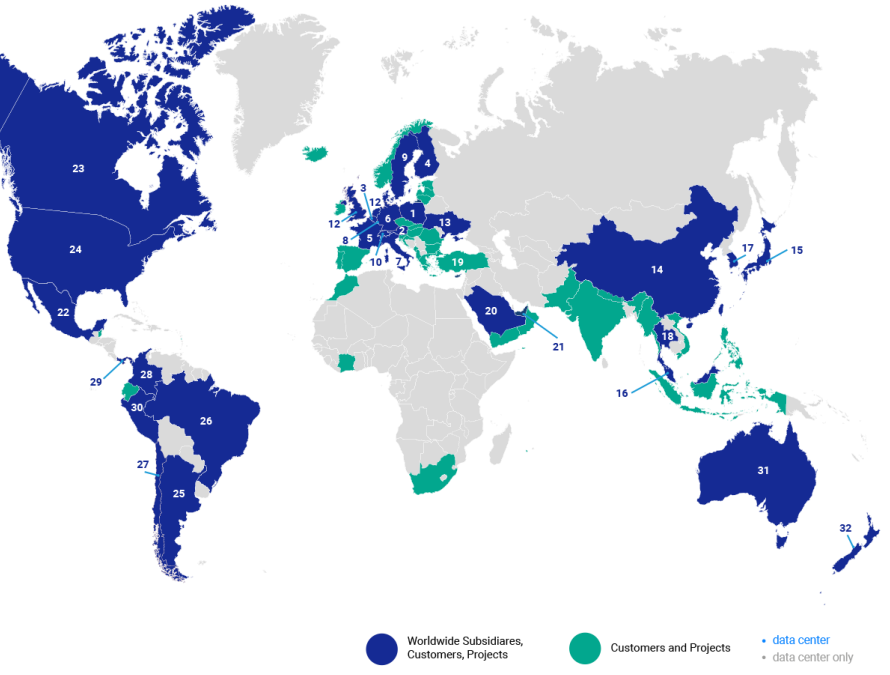
90
Offices

In
69
cities

In
32
countries

On
5
continents

- EUROPE**
- Poland
Bielszyce, Bielsko-Biala, Częstochowa, Gdańsk, Gliwice, Katowice, Kielce, **Kraków HQ**, Lublin, Łódź, Opole, Płock, Poznań, Rzeszów, Tarnów, Toruń, **Warsaw**, Wrocław, Zielona Góra
 - Austria
Innsbruck, Vienna
 - Belgium
Brussels
 - Finland
Espoo
 - France
Cergy, **Lille**, Lyon, Montbonnot Saint Martin
 - Germany
Berlin, Bremen, **Dresden**, Düsseldorf, Hamburg, Hannover, Munich, Münster
 - Italy
Milan, Rome
 - Luxembourg
Luxembourg
 - Sweden
Stockholm
 - Switzerland
Arbon, Zug
 - The Netherlands
Rotterdam
 - UK
London
 - Ukraine
Kyiv, Lviv
- ASIA**
- China
Shanghai
 - Japan
Tokyo
 - Malaysia
Kuala Lumpur
 - South Korea
Seoul
 - Thailand
Bangkok
 - Turkey
Istanbul
- MIDDLE EAST**
- Saudi Arabia
Riyadh
 - United Arab Emirates
Dubai, Abu Dhabi
- NORTH AMERICA**
- Mexico
Mexico City
 - Canada
Saint John, **Montreal**, Quebec, Toronto
 - USA
New York, Rosemont, Chicago, Columbia
- SOUTH AMERICA**
- Argentina
Buenos Aires
 - Brazil
Sao Paulo
 - Chile
Santiago
 - Colombia
Bogota
 - Panama
Panamá City
 - Peru
Lima
- AUSTRALIA**
- Australia
Sydney, Melbourne
 - New Zealand
Auckland



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



Comarch stores data in 16 data centres worldwide including four of its own (Krakow, Warsaw, Dresden, Lille).

In 2021, Comarch Inc. started the construction of a modern server room, in which the company will provide its services to clients from the USA and other countries of North and South America. The investment is located in Mesa, Arizona, USA, on the Elliot Road Technology Corridor, within which the largest high-tech enterprises operate. The commissioning of the investment is planned in the first half of 2023.

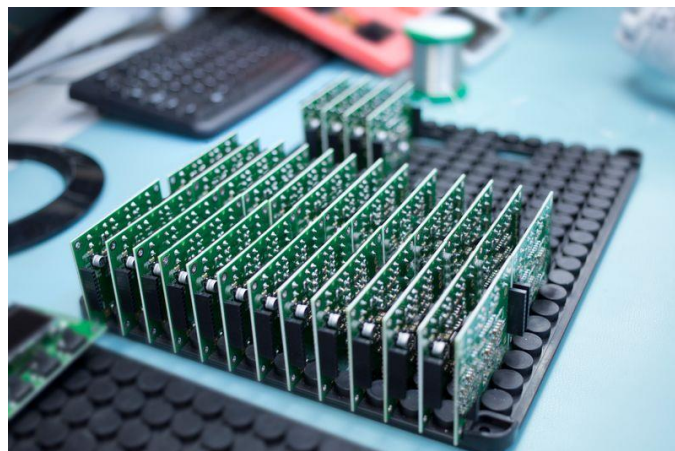
Other basic information about Comarch S.A. and the Comarch Group were published respectively in point 1 of the Statement of Comarch S.A.'s Management Board regarding the activities and Statement of Comarch S.A.'s Management Board regarding the activities of the Capital Group.

2.2. Research and Development and Activities in the Special Economic Zone

Research and development works

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 2022 reached PLN 398.9 million and thus exceeded 21.5% of Comarch Group's sales revenues. The Comarch Group allocated both own resources and European funds to them. 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 2022 reached PLN 375.2 million, which accounts for 31% of the Company's sales revenue.

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 3.11 of the Consolidated Financial Statements of the Comarch Group for [2022](#).

S.1.2.

The table below presents sales to customers from the public sector in 2021 – 2022.

in thousands of PLN	2022	%	2021	%
Revenue Comarch S.A.	1,210,626	100.0%	1,067,448	100.0%
<i>including public sector</i>	11,593	1.0%	14,836	1.4%
Revenue Comarch Group	1,858,715	100.0%	1,627,149	100.0%
<i>including public sector</i>	159,979	8.6%	133,821	8.2%

In 2022, the Comarch S.A.'s revenue from sales to the public sector clients decreased by 21.9%, i.e., by PLN 3,243 thousand, compared to 2021. Regarding Comarch Group's revenue from sales to public sector, they increased by 19.5%, i.e., PLN 26,158 thousand. The public sector was responsible for 8.6% of revenue of the Comarch Group in the discussed period.

Number of subsidies received in particular years

The table below presents the number of subsidies received by Comarch S.A. and the Comarch Group in 2021 – 2022.

in thousands of PLN	2022	2021
Comarch S.A.		
Horizon 2020 (European Commission)	8	-
Structural Funds POIR (Operational Program Innovative Development)	404	329
National funds	-	-
De minimis aid	-	144
Total	412	473
Comarch Group		
Horizon 2020 (European Commission)	8	-
Structural Funds POIR (Operational Program Innovative Development)	404	329
National funds	-	-
De minimis aid	200	543
Lesser Poland Regional Operational Programme (Structural Funds)	209	207
Anti-crisis politic COVID-19	-	125
Total	821	1,204

2.3. Organizational Culture and Business Model

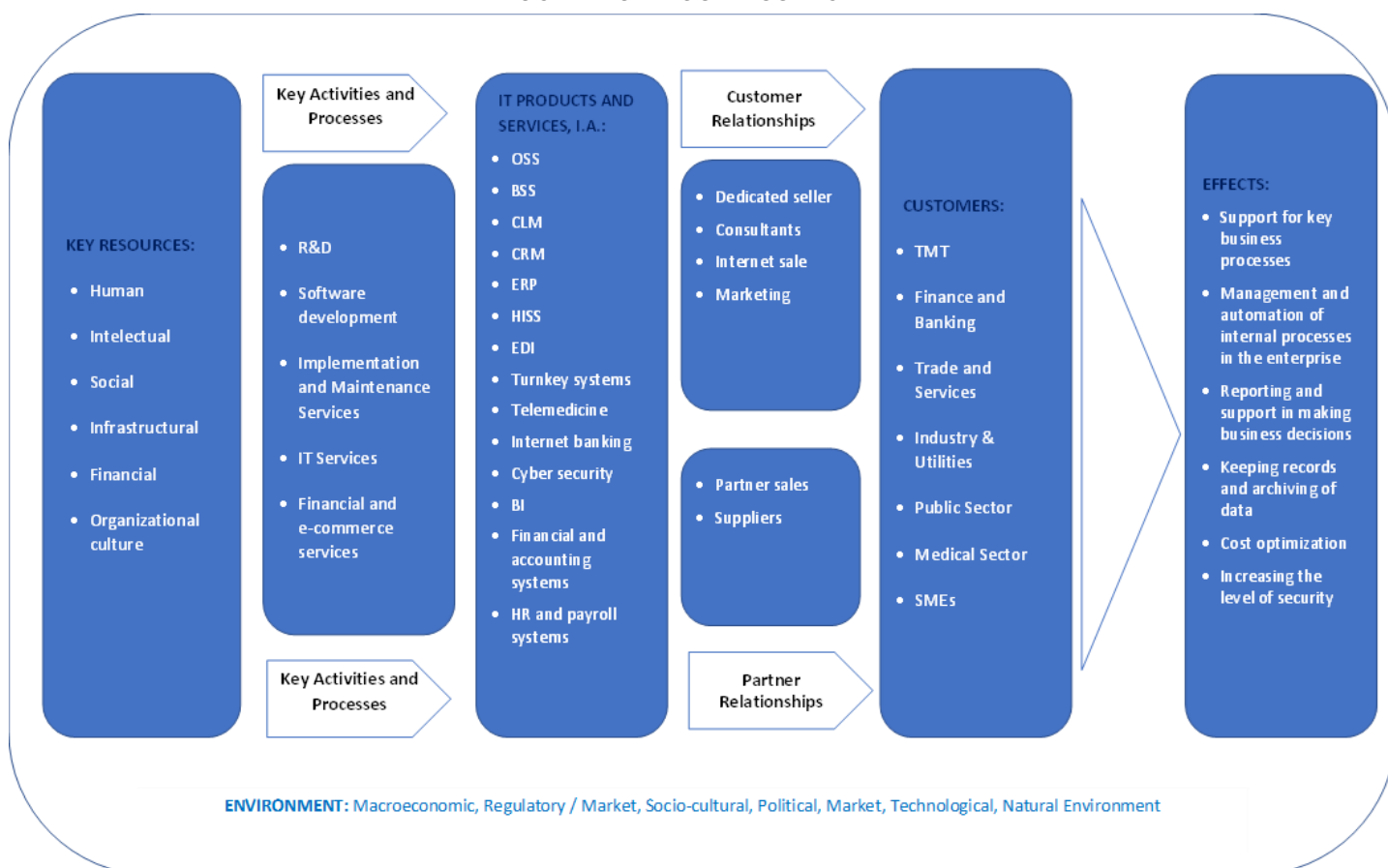
For 30 years, Comarch has been consistently building an organizational culture and value system, including:

- ongoing efforts aimed at ensuring the quality and competitiveness of our products and services,
- improving products and services in order to meet the requirements and expectations of our customers,
- engaging in mutually beneficial cooperation with our suppliers to improve the quality and offered products and services,
- protecting the information assets of our clients and reinforcing the confidence of customers and other interested parties in the area of information security,
- improving the skills and qualifications of personnel through an effective education system and trainings aimed at areas related to quality, information security, environmental protection, energy management and occupational safety,
- shaping quality, environmental, energy, health and safety awareness and information security among employees,
- preventing of workplace accidents, occupational diseases and high potential accidents,
- improvement of occupational health and safety and improvement of the management system in order to eliminate danger and reduce risks,
- engaging employee representatives to consult and participate in activities affecting health and safety at work,
- actively engaging in activities aimed at limiting negative environmental impacts and improving energy efficiency,
- obeying applicable legal requirements and other,
- 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.

Comarch's organizational culture is based on values such as: openness, commitment, innovation, quality and social responsibility. The company focuses on continuous improvement of its employees through training, development programs and promotion opportunities. There is an atmosphere of cooperation in Comarch, where the opinion of each employee counts, and decisions are made by consensus. The company also cares about good relations with customers and business partners, which translates into long-term and successful cooperation.

COMARCH BUSINESS MODEL



2.4. ESG strategy - assumptions and goals

In 2022, it was approved by the Management Board of Comarch S.A. strategy setting out the goals and main directions of activities in the area of ESG and sustainable development of companies belonging to the Comarch Group. The Sustainable Development Strategy is based on three pillars (E - Environment, S - Social Responsibility, G - Corporate Governance), within which the following main goals have been set for implementation over the next 5 years:

- reduction of CO2 emissions per employee by 20% by 2027 (compared to 2021) - (E),
- increasing the share of energy from own renewable sources to 20% of total consumption by 2027 - (E),
- conducting continuous activities leading to increasing energy efficiency - (E),
- continuous improvement of working conditions and increasing employee development opportunities - (S),
- supporting diversity and equality, e.g. by supporting the professional development of women employed in the organization: constant increase in the share of women employed and achieving the share of women in managerial positions adequate to the share of women in total employment - (S),
- effective implementation of an anti-mobbing policy defining mobbing behavior and providing for the procedure for reporting irregularities - (S),

- taking care of important social interests through dialogue with local communities, supporting sport and promoting a healthy lifestyle, undertaking initiatives in the field of culture and education, popularizing science - (S),
- providing material help to those in need and supporting charity campaigns - (S),
- strengthening the ethical organizational culture by means of information campaigns and training in ethics and compliance with the law within the company - (G),
- improving the functioning of systems, including: compliance management, risk management, internal control - (G),
- cooperation for sustainable development with customers and suppliers, including by committing to complying with the principles of ethics, respecting working conditions and meeting social and environmental criteria - (G),
- maintaining a dialogue with all stakeholders, including providing reliable, timely and credible information on non-financial data, including taking into account the TCFD recommendations on reporting climate issues - (G).

The full text of the document is available at: <https://www.comarch.com/investors/corporate-governance/>.

2.5. Key Non-Financial and Financial Performance Indicators

Qualified employees are the key resource of the Comarch Group, therefore the employment rate is one of the basic performance indicators of the company.

As at 31st of December, 2022, Comarch S. A. employed 5,469 persons compared to 5,206 persons employed as at 31st of December, 2021, while in the entire Capital Group the number of employees increased to 6,871 persons compared to 6,723 persons as at 31st of December, 2021.

The tables below present the average number of people employed at Comarch S.A. and in the Comarch Group in 2018– 2022.

Average number of employees in Comarch S.A.	2022	2021	2020	2019	2018
Employment agreement	4,585	4,327	4,117	4,057	3,753
Other form of employment	883	887	925	930	934
Total	5,468	5,214	5,042	4,987	4,687

As at 31st of December, 2022, in the Group 3,082 employees were employed in Krakow, 2,387 in other cities in Poland.

Average number of employees in Comarch Group	2022	2021	2020	2019	2018
Employment agreement	5,547	5,427	5,119	5,087	4,727
Other form of employment	1,373	1,360	1,383	1,361	1,364
Total	6,920	6,787	6,502	6,448	6,091

As at 31st of December, 2022 in Comarch Group 3,662 employees were employed in Krakow, 2,584 in other cities in Poland and 625 outside of Poland.

Details on employment are described in point 6.1. of this statement.

The activities of the Comarch Group are not indifferent to the condition and improvement of the natural environment. The Group makes every effort to both minimize the negative impact on the environment and

actively act for its protection, minimizing the consumption of natural resources and limiting the generation of waste resulting from its current operations.

The tables below present the consumption of electricity, heat, gas, water and CO₂ emissions in Comarch S.A. and in the Comarch Group in 2021 – 2022.

Electricity, heat, gas and water consumption and overall CO ₂ e emissions of Comarch S.A.*	2022	2021
Electricity consumption	16,474,942 kWh	17,435,591 kWh
Heat consumption	6,069,710 MJ	6,672,900 MJ
Gas consumption	435,003 m ³	513,742 m ³
Water consumption	30,888 m ³	24,736 m ³
Overall emission of CO ₂ e (Scope 1 and Scope 2)	14,677 Mg CO ₂ e	15,124 Mg CO ₂ e

* In 2022, the scope of consumption reporting in Comarch S.A. a building was added in Łódź at Jaracza 78 St. belonging to the Comarch Group, managed and reported to KOBiZE by Comarch S.A. Data for 2021 have been adjusted accordingly.

Electricity, heat, gas and water consumption and overall CO ₂ e emissions of Comarch Group	2022	2021
Electricity consumption	23,594,298 kWh	24,273,157 kWh
Heat consumption	17,943,880 MJ	20,432,105 MJ
Gas consumption	435,003 m ³	513,742 m ³
Water consumption	81,673 m ³	53,181 m ³
Overall emission of CO ₂ e (Scope 1 and Scope 2)	19,470 Mg CO ₂ e	20,020 Mg CO ₂ e

To report greenhouse gas emissions for 2022 and comparative data, the methodology compliant with the GHG Protocol Corporate Accounting and Reporting Standard was used. The Comarch Group constantly strives to minimize the negative impact of its operations on the environment. In the Scope 1 and Scope 2, a decrease in carbon dioxide equivalent emissions is observed compared to 2021 - in the case of Comarch S.A. by 2.95%, and in the case of the Capital Group by 2.75%, which is in line with the target set in the ESG strategy for CO₂ emissions.

Details on electricity, heat, gas, water and other emissions are described in point 8 of this statement.

2.6. Membership in International Organizations

Comarch is a member of **IT organizations**, such as ETIS and TM Forum, thus has continuous access to the latest standards emerging in these areas. (e.g. standards on TAP/RAP). The use of modern technologies in Comarch is understood not only as technical means for project implementation, but also as the maximum use of available standards. The TeleManagement Forum (TMF) is a non-profit organization that was founded in 1988 to accelerate the development of telecommunications network management systems. On the other hand, ETIS is an international organization aimed at exchanging information on the most important technological issues between telecommunications service providers in Europe. The mission of ETIS is to support members in increasing their business efficiency by exchanging information on the effective use of computer technologies.

In 2019, Comarch joined MEF. MEF is an industry association bringing together over 200 companies from the telecommunications industry.

Since 2020, Comarch has been a member of the O-RAN Alliance - a consortium dealing with the promotion based of a software, extensible RAN network and the standardization of critical elements of the O-RAN Alliance architecture.

Comarch is also a member of **international chambers of commerce and trade**, including the Polish-German Chamber of Industry and Commerce and the French-Polish Chamber of Commerce, or **industry organizations** around the world.

In Spain, Comarch is a member of AECOC - the Spanish representative of the global GS1 organization and Asociación XBRL España - an association promoting the implementation, adoption and development of the XBRL language in order to standardize the standards for the presentation of financial statements.

In Japan, Comarch belongs to the 21c Club business club as part of EGG JAPAN. 21c Club supports enterprises in creating and developing new B2B companies and is a platform for the exchange of knowledge and experience.

In Italy, where Comarch has been doing business since 2015, the company is a member of the Retail Institute Italy, whose mission is to promote the culture and development of the entire sector by offering basic content and strategic activities to be updated and competitive in an increasingly complex market scenario. In addition, Comarch belongs to the association of companies operating in the metropolis of Milan and in the provinces of Lodi, Monza and Brianza in Pavia - Assolombarda. The organization brings together companies of all sizes, national and international, producers of goods and services in all product sectors. The role of the association is to support member companies in contacts with local companies and institutions. The company is also a member of the Osservatorio Innovazione Digitale in Sanità. The mission of the institution is to create and disseminate knowledge about the opportunities and impact that digital technologies have on enterprises, public administration and citizens. It also belongs to the Polish Business Chamber in Italy with its seat in Bologna. The organization aims to develop constructive contacts between its members and other entities in the field of economy, science and entrepreneurship. In the Benelux countries, Comarch belongs to the Belgian-Polish-Luxembourg Chamber of Commerce. The chamber's mission is to promote Belgian and Luxembourg investments and exports to Poland, but it also supports Polish companies in cooperation with Belgian and Luxembourgish companies. Wojciech Pawluś, Comarch's Managing Director for the Benelux countries is a member of the BEPOLUX management board.

In France, Comarch is a member of the HUB-RETAIL "Cross-Canal and Omni-Logistics" association. The aim of the organization is to unite and cooperate the business environment in the Auvergne-Rhône-Alpes region and the related logistics sector in order to strengthen the industry and create relationships and synergies between players, especially between start-ups and large accounts that show high business activity and create workplaces. Comarch also belongs to the Adira organization, which brings together all regional IT players. Comarch is a member of AD2N, a regional association that brings together over 40 companies that provide digital services (ESN) and manufacturers of IT systems. It is also active in the structures of the Syntec Numérique. It is a professional organization that brings together companies providing digital services (ESN), software publishers and consulting companies in the field of technology (ICT). The company also belongs to Clubster NSL - Nutrition, Santé, Longévité, a cluster of companies from the agri-food, health, medical, biotechnology and e-health industries. Clubster NSL stimulates exchange and cooperation between the academic and industrial world and supports candidate innovative projects in the search for regional, national and European sources of funding.

The company is also a member of the PIKOM cluster, which brings together small and large research laboratories and training institutions dealing with a specific industry branch. The competitiveness cluster aims to support innovation. It promotes the development of particularly innovative joint research and development (R&D) projects.

In Australia, however, Comarch is a member of the Australian Loyalty Association. It is an organization founded to promote education and networking opportunities for people working in the loyalty industry. In addition, it is

also a member of Loyalty360, an association that operates in the market of customer loyalty marketing solutions, the aim of which is to enable and encourage dialogue between industry leaders.

2.7. Awards and Rankings in 2022

- "Partnership Award" from ENOC (Emirates National Oil Company) - Comarch received an award from a leading energy group operating in the oil and gas sector to commemorate over seven years of extremely successful business cooperation
- Report „**Computerworld TOP200**” – Comarch S.A. took the first place in the following categories:
 - provider of IT solutions and services for the telecommunications sector
 - provider of RPA systems and business process automation,
- **Pipeline Innovation Awards in 2022** - Comarch S.A. took first place in the following areas: Innovation in Operational Support Systems and Innovation in IoT and Connected Devices, and second place in the categories of Innovation in Assurance and Innovation in Business Support Systems.
- **Polish Innovation Award** - Comarch Healthcare S.A. was awarded the prize, which is given to the most innovative and creative entities in Poland. Among the winners are universities, institutes, companies and institutions from many industries, whose daily research and development activities significantly contribute to the development of the economy on many different levels.
- **Medals of the Mayor of Lublin** - On the occasion of the 10th anniversary of the Lublin IT Upland Comarch S.A. received a distinction for a special contribution to the development of the IT industry and ecosystem in Lublin. Comarch was among the IT companies honored with this award.
- **IT@BANK** - in the main ranking organized by Miesięcznik Finansowy Bank, Comarch S.A was ranked second. This is a move up from the fourth position where the company was a year ago. An excellent result in the ranking was achieved, among others, by thanks to the ratio of expenditures on research and development to revenues and the number of active customers of the financial sector.

Comarch in analytical companies reports

- Comarch was included in the report "**Gartner® Market Guide for CSP Customer Management and Experience Solutions 2022**". The company is included in this report because of its strong position in the CM&X market, and in particular because of its innovative and future-proof Enterprise BSS and IoT Connect products.
- Comarch appeared among the largest companies in the telecommunications industry in the report "**Market Outlook: End-to-end Service Orchestration**" prepared by Appledore Research. The document is a must-read for Communication Service Providers (CSPs) and providers interested in cross-domain orchestration who want to keep up with this growing market. It analyzes what end-to-end cross-domain service orchestration means, explains what it means, and describes the key concepts and practices necessary for its successful implementation. The whole is supported by the knowledge and experience of the largest and most significant players on this market today.
- In the Gartner® report for 2022 entitled "**Competitive Landscape: CSP Customer Management and Experience Solutions Report**", concerning solutions in the field of management and user experience of CSP platform customers, there was a mention of Comarch.

3. Stakeholder Engagement

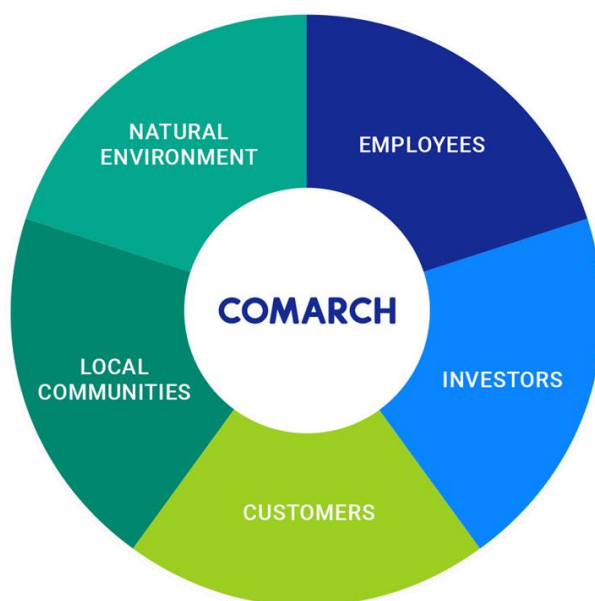
The selection and description of policies as well as the effectiveness indicators presented in the statement has been made on the basis of the materiality criteria, taking into consideration internal and external factors related to the operations of Comarch S.A. and the Comarch Group. The main factors taken into consideration during the materiality assessment were:

- Business profile and market environment,

- The branch 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 statement and approves all strategic decisions related to the process of creating a non-financial data statement. During its creation, the expectations of stakeholders were also taken into consideration.

The basis for identification and selection of stakeholders is the definition adopted by Comarch Group, according to which a stakeholder is an entity that has influence and is influenced by its activities.



The key stakeholders of the Comarch Group include:

- **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, Polish Association of Listed Companies),
- **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, including industry journalists and the press, universities and research workers, technical and industry organizations),
- **Natural environment** (environmental organizations, recycling companies).

The Management Board of the Comarch Group is aware of the need to involve stakeholders in the conducted activity. The Comarch Group engages in dialogue with all stakeholder groups.

The method of engaging stakeholders belonging to particular groups and the goals of the dialogue with them are presented below.

- **Employees:** recruitments, performance reviews, internal meetings, internal communication (mailings, portal for employees, Intranet), periodic happenings and events supporting an active lifestyle (e.g., by bike to work, ComarchOnRun / OnBike, racing events),
Dialogue 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 and video recordings), individual meetings and teleconferences with the Management Board of the Company, permanent cooperation of Capital Market and Insurance Department with stakeholders, 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,
Dialogue 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 and supporting the functioning of the community of users of Comarch solutions, e.g., in the form of regular meetings (including the annual Comarch User Group) or running websites dedicated to Comarch solutions on social networks, partnership cooperation with suppliers,
Dialogue 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, stable contact with media (by phone, e-mail, during conferences and press briefings), organization of internship programs,
Dialogue purpose: carrying social responsibility, supporting community development, supporting students and graduates in gaining knowledge and experience, ensuring compliance with requirements and regulations, creation of workplaces.
- **Natural environment:** organizing pro-ecological campaigns, cooperation with media suppliers, energy producers, environmental organizations and recycling companies,
Dialogue purpose: improvement of the quality of the natural environment, reduction of energy consumption, emission of pollution, reduction of the amount of waste generated.

An example of stakeholder involvement in the Comarch Group is the **Unique Comarch ERP Community**. The Comarch ERP community is a platform (www.Spolecznosc.Comarch.pl) on which Comarch ERP customers help by exchanging knowledge about Comarch ERP systems and also submit ideas for the development of these systems. All submitted ideas can be commented on and evaluated by members of the Community, Comarch analyses the highest-rated ones in terms of implementation. Comarch Partners are also active in the community, supporting customers with their knowledge and experience and also reporting ideas for software development. Comarch employees also participate in the discussions.

The project is a unique undertaking - it not only allows the exchange of knowledge as a traditional forum, but also gives Customers the opportunity to influence the development of products that they use on a daily basis. It is also appreciated by entrepreneurs looking for software for which the platform is open. At the stage of

choosing a company management system, they can contact Comarch system users, ask questions, clarify doubts, and read all discussions.

Community participants are additionally activated thanks to the use of gamification elements, allowing for competition between users, obtaining badges and competences.

The community is alive, not a day goes by without new users, questions and ideas appearing on it.

On the main page of the platform, you can follow the current statistics, which at the end of March 2023 are as follows:

- 15,380 questions asked,
- 40,647 answers,
- 15,818 comments,
- 3,282 ideas for new functionalities and improvement of existing ones, over 300 of which have been implemented by Comarch.

Welcome to www.Spolecznosc.Comarch.pl

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

4.1. Integrated Management System

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

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 9001:2015-10 Quality Management Systems, PN-EN ISO 14001:2015-09 Environmental Management Systems, PN-ISO 45001:2018-06 Occupational Safety and Health Management Systems, PN-EN ISO/IEC 27001:2017-06 Information Security Management Systems,
- Certificate of Energy Management System compliant with the requirements of PN-EN ISO 50001:2018-09 Energy Management Systems,
- Certificate of the Internal Control System, which meets the requirements of Article 11(2) the Act of 29th of November, 2000 on foreign trade in goods, technologies and services of strategic importance for national security, as well as for maintaining international peace and security (as amended),
- Certificates which confirm that the Quality Management System meets the requirements of AQAP 2110: 2016- 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.

Certificates of the Integrated Management System, Energy Management System and Export Control System Policy were issued by the Polish Centre for Testing and Certification (PCTC).

The Integrated Management System is certified in Comarch S.A., while its provisions are binding in the companies of the Comarch Group.

Comarch Healthcare S.A. BU HIS, previously certified for compliance with ISO 9001: 2015 Quality Management Systems, was incorporated into the structure of Comarch S.A. in 2021 and covered by the IMS certificate.

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, energy management, ensuring occupational safety and health, as well as ensuring information and data security and control in technologies and services of strategic importance to state security.

The Integrated Management System Policy is the main document of the Integrated Management System. This policy includes the organization's overall intentions and objectives regarding quality, environmental protection, health and safety, energy management and information security, which are formally expressed by Company's top management.

The obligations and activities under the Policy are described in point [2.3. Organizational Culture and Business Model](#).

Detailed information on the Comarch's IMS Policy can be found at: <http://www.comarch.pl/o-firmie/zrownowazony-biznes/polityka-jakosci/> (ENG: <https://www.comarch.com/company/quality/>).

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 Policy has been implemented within the Comarch Capital Group, whose main document is the **Internal Control System Policy**. The main assumptions of this policy are as follows:

- Excluding the possibility of making a profit contrary to the requirements of the Export Control System Policy,
- Omission to handle trade in goods when it is contrary to national and international law,
- Preventing transactions with customers involved in the proliferation of weapons of mass destruction,
- Enforce the rules of the Export Control System Policy at all workstations related to trade in goods,
- Supervision of the Transaction Control Officer over the course of the Export Control System Policy processes.

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 OHS management take into account risks related to employee issues and impact on the environment. The Export Control System Policy 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. An opportunity for the organization is to start cooperation with new clients, establish new business relations.

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 following chapters.

Comarch is aware of the importance of identifying, analysing and dealing with risk. As part of the activities carried out, the Integrated Management System is adapted on an ongoing basis to the requirements of the updated ISO standards, in which particular emphasis is put on issues related to at risk - a risk-based approach to management is recommended and risk at system level should be considered.

For the particular systems of the Integrated Management System, as part of the company's overall process, the following risks have been identified:

- Risk related to the deterioration of the quality of products and services offered, failure to meet customers' quality expectations,
- Risk related to the occurrence of non-compliance and instability in internal processes,
- Risk related to non-compliance with applicable legal and other requirements for the organization in the field of IMS, as well as negative results of external controls,
- Risk related to establishing cooperation with a counterparty on the Lists of refusals, an entity from countries subject to restrictions or a ban on trading, as well as other types of sanctions,
- Risk related to the negative impact on the environment,
- Risk related to energy supply in the future due to global warming and the EU energy transformation,
- Risk related to the potentially accidental events,
- Risk related to the epidemic situation,
- Risk related to the inability to obtain a contract to provide products and/or services for the armed forces in Poland and other NATO countries,
- Risk related to the low awareness of employees in the field of IMS,
- Risk related to non-compliance with IMS certification.

The risks identified within the Information Security Management System along with the implemented mechanisms are described in a separate part of this chapter.

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. From the point of view of the Internal Control System, it is also important to monitor and react to the global situation, including possible sanctions.

In 2021, at Comarch S.A. a compliance and internal audit function was established in the form of a separate unit responsible, inter alia, for ensuring compliance with the law, the area of internal control and internal audit. The main tasks of the newly established unit are:

- supporting the organization to minimize the risk of non-compliance with the law, internal regulations, as well as ethical and moral standards,
- enabling the identification of risks that may affect the achievement of the business goals set by the organization and appropriate management of these risks,
- assessment of the effectiveness of the organisation's internal control and risk management system.

All the activities described above aim at minimizing the identified risks areas, 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 the case of the ECS, 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 ECS,

processes, such as dealing with dual-use goods and services or verification of contractors on refusal lists, are described in internal procedures. The ongoing actions are taken to improve the Export Control System.

For communication purposes, e-mail addresses were provided to which employees can submit their comments. Employees also have the option of submitting anonymous reports regarding violations of the implemented policies, which are sent to the addressees in paper form via internal mail.

As part of the Integrated Management System, internal audits are carried out, the number of which in 2022 was 135. Internal audits are carried out in all entities covered by IMS according to the annual plan. Supervision over the processes specific to ECS is also performed as part of internal audits.

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 2022, 38 non-compliances, 209 strengths and 133 potentials for improvement were identified.

The policies implemented within the Integrated Management System are described below.

Information Security Management System and Security Policy

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

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 27001:2017-06 and PN-EN ISO/IEC 27002:2017-06 standards was implemented. The system is certified for compliance with the PN-EN ISO/IEC 27001:2017-06 standard by the Polish Center for Testing and Certification (PCBC) 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. Its first certification took place in 2008.

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 client's 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 preventive 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,
- non-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.

Supplier Sustainability Policy

[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 meet the criteria to the greatest extent possible. 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 Supplier Sustainability Policy, 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,
- Ensuring high quality products and services for customers on the international market, while paying particular attention to the safety of information resources, environmental aspects and health and safety of employees,
- 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 labour.

G.3.2. As part of the Supplier Sustainability Policy, 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 Integrated Management System Policy 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 Comarch Group has implemented the **Policy of Respect for Intellectual Property of Third Parties**.

The basic policy objectives in force 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).

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.

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,

- 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 Integrated Management System Policy. 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, OHS Department and the Law Department via a dedicated email address.

4.2. Management Systems implemented in Comarch Group companies

Quality Management System for Medical Devices Comarch S.A. and Comarch Healthcare S.A.

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

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 have a certified Quality Management System for Medical Devices in accordance with the EN standard. ISO 13485: 2016. The scope of the certificate for Comarch Healthcare S.A. includes design and development, production, distribution and servicing of vital signs monitoring systems as well as post-implementation service, while for Comarch S.A. design and development, own and contract production, distribution, implementation and servicing of software as well as products and accessories as well as systems for monitoring vital functions as well as the implementation of post-implementation services in this area.

Certificates of the Quality Management System of Medical Devices were issued by TÜV Rheinland LGA Products GmbH for both companies.

By decision of the Management Board, Comarch Healthcare S.A. was to act as a manufacturer of medical devices until its certificates expire in February 2023. From 2022, the main manufacturer of medical devices, also certified for compliance with the requirements of Regulation (EU) 2017/745 of the Parliament and of the Council of April 5, 2017 on medical devices (MDR), is Comarch S.A.

Comarch S.A. designs and manufactures medical devices with a view to improving the quality of life and a sense of security, and out of concern for the health of customers. Taking into account the problems with access to medical staff, solutions in the field of telemedicine and telemonitoring are being implemented, which allow to shorten the distance between the patient and the medical staff. The solutions allow remote care and monitoring of the health of many patients at the same time. The offered products are a response to the needs of the market in the field of prevention and treatment, moreover, they are prepared on the basis of the latest technologies, as a result of cooperation between qualified employees and 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 Comarch S.A. and Comarch Healthcare S.A. Quality Policy has been implemented. In order to implement the provisions of the Policy, the Management Board and employees of the above-mentioned companies are obliged to:

- Meet legal requirements and maintain the effectiveness of the quality management system,
- Set goals adequate to the needs of the organization,
- 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,
- 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.

G.3.2.

The means of achieving the above goals is the implemented and constantly improved ISO 13485 quality management system correlated with the applicable legal requirements. As a part of the Policy of Quality of Medical Devices, the following critical risks have been identified:

- Risk related to the development of requirements for medical devices,
- Risk associated with an increase in certification costs and limited access to notified bodies for compliance with MDR (Medical Device Regulation).

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 functioned the risk management process, in accordance with the ISO 14971 standard, 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, it is also possible to report the so-called medical incidents. The MDR changed the definition of a medical incident and now this term is defined as any malfunction or deterioration of properties or performance, including a usability error resulting from the ergonomic features of a device made available on the market, as well as any irregularities in the information provided by the manufacturer and any adverse reactions. In response to the requirements, a notification system was launched and made available to customers. A dedicated group of people reviews the reports on a weekly basis and makes decisions regarding solving reported problems and planning development work.

Applications are also reviewed in terms of whether they do not have the characteristics of the so-called serious incidents that may directly or indirectly result in the death of a patient, user or other person, temporarily or permanently impair the health of a patient, user or other person, or seriously endanger public health.

Since the beginning of activities related to the design, development and production of medical devices, no serious medical incidents have been identified.

Quality Management System at the iMed24 Medical Centre (Comarch Healthcare S.A.)

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

G.2.2.

iMed24 Medical Centre, established in 2012, follows the principles of professionalism, innovation and cooperation based on trust and understanding. Years of experience have allowed us to develop the highest standards of services, which is reflected in the large volume of clients and subcontracting facilities. iMed24 Medical Center operates within the framework of applicable legal requirements and is certified by the Quality Management System ISO 9001:2015. . The scope of the certificate covers the provision of health services as part of the clinics and laboratories, including the provision of remote services. The certification process is carried out by TUV Rheinland Polska Sp. z o.o.

G.3.2.

The provision of medical services carries specific risks. Risks within the system are identified at the company-wide level. Within the system identified i.a.:

- Risk related to the occurrence of a medical error,
- Risk related to the exposure of medical personnel to harmful factors,
- Risk related to the failure of medical equipment, systems or power supply,
- Risk related to unauthorized access to medical data,
- Risk related to non-compliance with legal requirements and procedures in force at MC iMed24.

G.3.1.

Risk management in a medical service provider is particularly important. The entity has appropriate internal mechanisms to minimize the identified risk areas, control them and exercise ongoing control. Particular attention is paid to the security of personal and medical data.

Information Security Management System in Comarch S.A.S.

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

G.2.2.

Comarch S.A.S. is a subsidiary of the Comarch Group, which aims to expand into the French market. The company's area of activity is offering IT infrastructure and software, especially in the health sector.

Comarch S.A.S. with Data Centre in Lezennes, France, has an Information Security Management System. The company has obtained an appropriate certificate, which proves that the management system meets the requirements of ISO/IEC 27001: 2013. The scope of certification for Comarch S.A.S. includes the infrastructure and services hosted at the Data Centre location in Lezennes, France, managed by the French team of Comarch S.A.S. The certification process is carried out by Bureau Veritas Certification Holding SAS - UK Branch.

Comarch S.A.S. also obtained the HDS certificate, which allows the storage and processing of personal data concerning health, and confirms that it operates in this area in accordance with the highest standards of security and data protection. The obtained certificate makes Comarch S.A.S. will be able to offer its customers and partners highly secure data hosting with controllability. The certification process is carried out by Bureau Veritas Certification France.

Risk management within the system is carried out on a continuous basis, using an appropriate methodology. As part of risk management, with regard to the implemented systems, appropriate internal audit and verification mechanisms were introduced.

Information Security Management System at Comarch Software und Beratung AG

[area: social, employee, natural environment, respect for human rights]

Comarch Software und Beratung AG is a subsidiary of the Comarch Group, whose goal is to expand into the German market.

G.2.2.

Comarch Software und Beratung AG with Data Center in Dresden, Germany has an Information Security Management System. The company has obtained the appropriate certificate, which proves that the management system meets the requirements of the ISO/IEC 27001:2013 standard. The scope of certification for Comarch Software und Beratung AG includes IT services, including data center operation, IT services and software development. The certification process is conducted by TÜV Rheinland Cert GmbH.

4.3. Code of Conduct of the Comarch Group

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 is in force in the subsidiaries of the Comarch Group and obliges them to regularly assess compliance with the principles, standards and values contained in the Code and to update its content based on new trends and customer expectations. 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. and Quality, OHS Department.

The full text of Comarch's Code of Conduct can be found at: <http://www.comarch.pl/o-firmie/zrownowazony-biznes/kodeks-etyczny/> (ENG: <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 appointed Spokesperson on Ethics. Comarch employees are encouraged to submit any comments and modifications related to the content of this Code of Conduct.

The Spokesperson on Ethics is responsible for:

- 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.

G.3.2.

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

- Risk of violation of ethics, corporate responsibility, respect for human rights and environmental protection,
- 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.

The Comarch Group minimizes the risks related to non-compliance with the principles of the Code of Conduct by adhering to international standards in the field of human rights protection, creating a safe and ergonomic work environment and caring for the natural environment. Employees have the right to expect help and support from the Spokesperson on Ethics 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. All submissions are reviewed by an independent committee and qualified as approved or rejected. If the notification is recognized, appropriate steps are taken to resolve it. According to the register, in 2022 there was one notification regarding the violation of ethics rules, as a result of which an investigation was conducted.

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

In the occurrence of any irregularities, including in the dimension of employment, employees have the opportunity to report them to supervisors. In addition, reports of any infringements of working conditions, ethics and environmental protection may be reported by employees to the Spokesperson on Ethics to etyka@comarch.pl or anonymously by internal mail.

In the first quarter of 2022, an additional infringement reporting channel was implemented in the form of an application, enabling anonymous reports along with the possibility of anonymous two-way communication with the person reporting the infringement. At the same time, appropriate procedures regulating the principles of filing notifications, conducting explanatory proceedings and protection of persons reporting violations have been implemented.

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. Compliance with the rules adopted in the organization, including the Code of Conduct, is also one of the elements of the periodic evaluation of employees.

Comarch does not carry out stationary ethical audits with suppliers, however, as part of the Supplier Sustainability Policy, Comarch supports and encourages suppliers to follow ethical principles in their activities. In the survey of suppliers carried out in 2022, on a question in the survey: *Does your company have implemented the Code of Conduct?* „YES” was answered by 66% the companies, which sent back the questionnaires. Suppliers who answered “YES” to this question in 2021 accounted for 100% of respondents.

4.4. Human Rights

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.

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.

G.4.6

Both 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.

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 and later during IMS trainings carried out every 5 years.

The tables below show the number of people participating in the First Step training sessions, which deal with ethical issues at Comarch S.A. and in the Comarch Group in 2021- 2022.

Comarch S.A.	2022	2021
number of people participating in training	1,016	857
total number of training hours	1,016	857
% of trained employees from among newly hired	84%	83%

Comarch Group	2022	2021
number of people participating in training	1,124	951
total number of training hours	1,124	951
% of trained employees from among newly hired	70%	73%

A register of people participating in the Integrated Management System training courses is also kept, the scope of which also covers ethical issues. The data presented below show how many people participated in such training in total. However, there is no division into newly hired persons and persons repeating the training after 5 years.

The table below presents the total data for the Comarch Group companies in 2021-2022.

Comarch Group	2022	2021
number of people participating in IMS training (people newly hired and repeating the training after 5 years)	1,875	1,878

The Comarch Group companies do not directly employ security employees and maintenance of cleanliness of facilities - this scope of work has been entrusted to specialist external companies. Agreements concluded by Comarch S.A. with companies employing physical security personnel contain provisions on providing training in human rights and providing Comarch with a report confirming that such training was carried out.

4.5. Climate Policy

Taking care of climate-related issues is one of the priorities of the Company's Management Board. When planning new investments and conducting current operations, the Management Board of Comarch S.A. takes into account climate issues, which was reflected both in office investments (low or zero-emission buildings, the use of photovoltaic installations, using of energy-saving lighting solutions), as well as in established internal rules related to the organization of workplaces and building climate awareness among employees (introduction of company-wide solutions for waste segregation, application of energy-saving lighting solutions, promoting and supporting pro-climate initiatives and activities).

As part of the preliminary analysis of the phenomena of climate policy, the following potential risks were identified:

- Risk related to the negative impact on the environment,
- Risk of cooperation with contractors who do not meet the requirements of the climate policy and violate the principles of environmental protection,
- Risk of incidents related to leaks in refrigeration and air conditioning equipment,
- Risk of increased use of energy necessary to power refrigeration and air conditioning equipment (office buildings and CDC) in periods of excessively high temperatures.

Due to the fact that managing risk and issues related to the climate is one of the important responsibilities of the Management Board of Comarch S.A., the identified risks are monitored on an ongoing basis by the Management Board, which takes all necessary actions to minimize the occurrence of events that could have a negative impact on the climate and natural environment. Starting from 2020, risk management activities have assumed a systemic nature, reflected in the annual verification and analysis of the Company's activities in this area. Regardless of systemic analytical and verification activities, the Management Board of Comarch S.A. is properly prepared to take all necessary preventive measures to minimize the negative impact of potential risks and events on Comarch's climate policy.

4.6. „Sustainable Development and Corporate Social responsibility”

In March 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 2,050 project refers to the international initiative taken by the World Business Council for Sustainable Development (WBCSD). Vision 2,050 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.

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.

4.7. Prevention of Corruption

[dimensions: society, employment, prevention of corruption]

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

The Anti-Corruption Policy, implemented in the Comarch Group, is a set of obligatory rules and standards of conduct aimed at preventing and responding to activities that may be marked by corruption. The Anti-Corruption Policy sets out how to deal with a threat of corruption or corrupt behaviour.

The Anti-Corruption Policy complements the provisions of national and international law in the field of anti-corruption, and the obligation to comply with these provisions rests with each employee, co-worker and representative of the Comarch Group.

The adopted Anti-Corruption Policy defines the principles to which all employees, co-workers and representatives of the Comarch Group are obliged to adhere, which are above all:

- transparency of operations and zero tolerance of corruption,
- compliance with national and international law.

The Policy is complemented by the Comarch Group Anti-Corruption Guidelines, which contain detailed rules of conduct for employees, co-workers and representatives of the Comarch Group, aimed at preventing the occurrence of corruption risks and responding to any symptoms of corruption.

G.3.1.

Suspected violations of the principles of the Anti-Corruption Policy or other legal regulations may be reported by employees to etyka@comarch.pl or anonymously to the Spokesperson on Ethics.

Employees have the right to expect help and support from the Ethics Officer in the field of submitted inquiries to a dedicated email address. In addition, employees have the option of anonymously reporting any ethics violations via internal paper mail. All applications are reviewed by an independent committee and qualified as approved or rejected applications. If the notification is accepted, appropriate actions are taken to resolve it. In addition, a dedicated application is used to report irregularities in accordance with the applicable procedures, which ensures full anonymity.

Legal action wasn't taken against Comarch S. A. or any other company in the Comarch Group concerning infringements of free competition rules and monopolistic practices. Non-financial sanctions have not been imposed for non-compliance with laws and regulations.

S.10.1.

The Comarch Group has assessed its operations in terms of the potential for corruption and is taking measures to minimise the associated risks, including by implementing procedures to prevent corrupt behaviour, as well as by providing training to employees who may come into contact with such behaviour. The Group has and has implemented an Anti-Corruption Policy, which includes Guidelines for counteracting corruption in the Comarch Group, containing detailed recommendations for employees.

G.3.2.

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

- The risk related to non-compliance with the rules of fair competition, prevention of bribery, illegal payments and corruption,
- The 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.

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 in. from an individual user account. All this is designed to prevent unauthorized transactions by employees. Absence of tolerance for corruption and compliance of the principles of fair competition are also contained in point V of the [Comarch Capital Group's Code of Conduct](#).

S.10.3.

No confirmed occurrences of corruption.

Comarch does not provide support for political parties, politicians or institutions of a similar nature.

S.10.2.

No occurrences of corruption-related behaviours were reported.

4.8. Corporate Governance

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. As at the publication date of this report, Comarch S.A. is subject to a new set of corporate governance principles called "Good Practices of WSE Listed Companies 2021", which have entered into force on the 1st of July, 2021.

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 28th of April, 2023, the Management Board of Comarch S.A. submitted a statement on the application of corporate governance principles by Comarch S.A. in 2022.

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. The company does not apply the rules 2.1. and 2.2. Detailed information on this subject can be found in the Statement regarding the acceptance of corporate governance principles in Comarch S.A. published in 2023.

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 export 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 Statement regarding the acceptance of the corporate governance principles is also available at: www.comarch.pl/relacje-inwestorskie/lad-korporacyjny (ENG: <https://comarch.com/investors/corporate-governance/>).

5. Contractors

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. Managing Relations with Contractors

Within the organizational structure of the Comarch Group there is a Contractor Management Department involved in verifying and analysing contractors.

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.

5.2. Suppliers

Characteristics of 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 2022, 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.

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 the Comarch Group operates.

The following tables present the share of the value of purchases from suppliers from individual locations in Comarch S.A. and the Comarch Group in 2021 – 2022.

Suppliers of Comarch S.A. - share of purchase value from suppliers in each location	2022	2021
Poland	84%	84%
DACH	5%	4%
Europa-other	6%	7%
Americas	2%	2%
Other	3%	3%

Comarch business region - share of purchase value from suppliers in each location	Local suppliers %		Foreign suppliers %	
	2022	2021	2022	2021
Poland	88%	89%	12%	11%
DACH	30%	35%	70%	65%
Europa-other	25%	24%	75%	76%
Americas	58%	45%	42%	55%
Other	12%	13%	88%	87%

Rules to be Observed by Suppliers

The Comarch Group makes every effort to ensure that public-law and financial liabilities, liabilities towards employees and suppliers from outside the Comarch Group, are settled in a timely manner. The rate of payments received on-time in Comarch S.A. in 2022 amounted to 95% of the value of liabilities and 96% in the Comarch Group. In 2021, the rate of payments received on-time in Comarch S.A. amounted to 96% of the value of liabilities and 95% in the Comarch Group

The Comarch Group, a global integrator and creator of innovative solutions and information systems, in the care of the quality of its products and services, attaches great importance to the careful selection of suppliers.

The main selection criteria are: price, time of order fulfilment, timeliness and the supplier's opinion and position on the market. The evaluation of the cooperation so far also has an impact on the choice of the supplier to

execute orders. However, consideration is also given to aspects related to respect for human rights suppliers, compliance with occupational health and safety rules, the impact of their activities on the environment.

For years, actively working for sustainable development, the Comarch Group encourages suppliers to follow ethical principles, social responsibility and manage environmental impact in a responsible manner. Hence, based on international recommendations contained among others in the Universal Declaration of Human Rights of the UN, International Labour Standards of the ILO, ISO standards and many others, the Supplier Sustainability Policy was developed.

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

Below is presented what part of the contracts signed in previous years by the Comarch Group companies with software and computer hardware manufacturers and key subcontractors (those with which the turnover exceeds PLN 100 thousand) contain provisions regarding ethical, anti-corruption, OHS standards and respect for human rights. The companies with which the Comarch Group cooperates are large international corporations, where great importance is attached to compliance with the requirements related to ethics, regulations on OHS, human rights, including the prohibition of child labour or forced labour.

The Comarch Group analyses and selects suppliers to promote those companies that are guided by the principles of ethics, social responsibility, human rights and environmental protection.

The following tables present the percentage of contracts signed in 2021 – 2022 by Comarch S.A. and companies of the Comarch Group with producers of software and computer hardware, as well as key subcontractors, which contain provisions on ethical, anti-corruption and OHS standards and respect for human rights.

Key Manufacturers and Subcontractors in 2022	Ethics	OHS	Human rights	Respect for the environment	Human rights including the prohibition of child labour or forced labour
Comarch S.A.	83,6%	71,5%	71,0%	71,3%	71,0%
Comarch Group	82,9%	66,3%	66,3%	66,5%	66,3%
Key Manufacturers and Subcontractors in 2021	Ethics	OHS	Human rights	Respect for the environment	Human rights including the prohibition of child labour or forced labour
Comarch S.A.	79.0%	62.5%	70.5%	62,0%	70,5%
Comarch Group	81.6%	65.1%	73.4%	64,7%	73,4%

Assessment of Cooperation with Suppliers

Companies applying for the status of the Comarch Group supplier receive a questionnaire to complete, which contains questions about the scope of implemented and certified management systems, regarding occupational health and safety, social responsibility, care for environmental protection, energy management and information protection. Answers provided in the questionnaire are validated, and then the company is qualified by the system to one of four categories of suppliers: I - chosen for cooperation in the first place, II - second order, III - reserve, IV - risky. The highest, first category is given to those companies that declare adherence to the highest standards.

In accordance with the supplier analysis procedure, questionnaires are also sent regularly every year to companies that completed the questionnaire in the previous years in case the suppliers noticed changes in the areas covered by the survey in their organization. In 2021, 200 surveys were sent, completed by 9 suppliers. Due to the planned change of the platform for sending surveys, periodic surveys in 2021 were not sent. In May 2022, the process of designing surveys, sending them and collecting responses was transferred to the SurveyLab platform. By December 31, 2022, 860 surveys (including cyclical ones) were sent from this platform, which were completed by 29 suppliers.

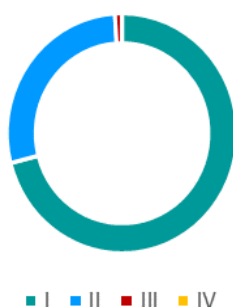
In the next stage of the analysis, after the execution of the order, the quality of cooperation is also evaluated. Included are: flexibility in solving problems, information flow during the process of ordering, keeping the delivery deadline / performance of the service, compliance of the order with the specification, invoice compliance with arrangements (price, payment terms). Based on the average assessment of cooperation from the last year of the assignment provider is one of four categories: I - chosen for cooperation in the first place, II - second order, III - reserve, IV – risky.

The following table presents the categories assigned to suppliers assessing the quality of cooperation in 2021 – 2022.

Categories assigned to suppliers	I	II	III	IV
2022	71%	28%	1%	0%
2021	68%	30%	2%	0%

The categories were assigned based on the results of the evaluation of cooperation with 605 entities in 2021 and 635 entities in 2022.

Assessment of cooperation in 2022



Assessment of cooperation in 2021



The results of supplier analysis are collected in the IT system, which allows quick generation of cross-sectional reports and conducting periodic monitoring

5.3. Customers

Characteristics of Customers

S.15.2.

Due to the type of IT systems offered by the Comarch Group, the main group of recipients are medium and large enterprises, which are the largest recipients of advanced IT solutions around the world. Most of the Comarch Group's products are targeted at a specific group of recipients, while IT services, due to their universal nature, are offered to each group of recipients. The Comarch Group's offer is intended for both Polish and foreign customers. For many years, one of the main strategic goals of the Comarch Group has been the development of sales of an increasing number of products on foreign markets, in particular in Western Europe, Asia, Oceania and North America. Sales of the Comarch Group are highly diversified and there is no dependence on one recipient. As in Comarch S.A., in Comarch Group in 2022 sales to any of the contractors did not exceed 10% of total sales.

The most important principles of the Comarch Group are: responsibility for the clients' success, as well as respect and openness to their needs. The Comarch Group 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.

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 11th of September, 2019 (consolidated text: Journal of Laws of 2022, item 1710 as amended). 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.

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 Group has implemented an Export Control System Policy 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.

Safety of Products and Consumers

The Comarch Group is a producer of IT solutions and an integrator. Since 1993 Comarch has been helping clients to achieve greater profitability and profit from modern products and solutions, using a wide range of tools complemented by top quality services. Comarch has gained experience in the most important industries (in telecommunications, finance, banking and insurance, trade and services, IT infrastructure, public administration, industry, health care, as well as small and medium-sized enterprises) thanks to projects carried out for the largest Polish and world brands <https://www.comarch.pl/o-firmie/profil/> (ENG: <https://www.comarch.com/company/comarch-at-a-glance/>).

The Comarch Group is also a manufacturer of electronic devices, including medical devices. The Comarch Group makes every effort to ensure that the products introduced meet the needs of the market and consumers, while being safe. Manufactured products shall, where applicable, be subject to conformity assessment as defined in the applicable regulatory requirements, including the required tests and trials for safety and performance. The Comarch Group also provides reliable information on the intended use of the offered products; it also informs about the risks associated with the products during their normal or reasonably foreseeable use during the life of the product, taking into account situations where the benefits of using the product outweigh the possible risks.

When producing electronics, the Comarch Group also takes into account the requirements related to environmental protection.

In 2022, neither Comarch S.A. nor any other company in the Comarch Group was penalised for non-compliance with laws and regulations on the provision and use of products and services.

In order to strengthen the quality and safety assurance of the offered products, Comarch S.A. has implemented and certified the Integrated Management System described in section 4.1.

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 S.A. or Comarch Group companies for non-compliance with laws and regulations on issues related to customer safety, reliability and ethics of marketing communication.

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).

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

Due to the entry into force of the regulation on personal data protection in 2018, the Comarch Group has implemented a number of personal data protection procedures supplementing the policies and procedures based on ISO standards that have already existed in the company for many years.

In accordance with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of the 27th of April, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 /WE (GDPR), in companies for which such an obligation occurred, Personal Data Inspectors were appointed . In addition, a number of registers required by the provisions of the GDPR are kept, including a register of personal data breaches - internal record of personal data breaches.

Both in 2022 and in the previous years , there were no administrative proceedings conducted against Comarch Group companies (e.g., PDPO, Personal Data Protection Office), as well as no penalties have been imposed for non-compliance with the law and regulations on issues related to personal data protection (broken down into legally binding and non-binding ones).

In 2022, ten infringements of personal data protection in Comarch Group were reported, which, after analysis, did not need to be reported to the supervisory authority due to the low probability that they would result in a risk of violation of rights or freedoms of natural persons.

The number of infringements recorded in the internal register in the last two years fluctuates around a dozen cases per year and remains at a similar, constant level. The continuous increase in employees' awareness in the area of personal data protection, in connection with the conducted trainings, information campaigns in the field of personal data protection and instructions implemented on an ongoing basis, translates into not repeating existing breaches, better detection, and thus also affects the prevention of further breaches.

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 Group 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.

Customer Satisfaction Survey

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

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.

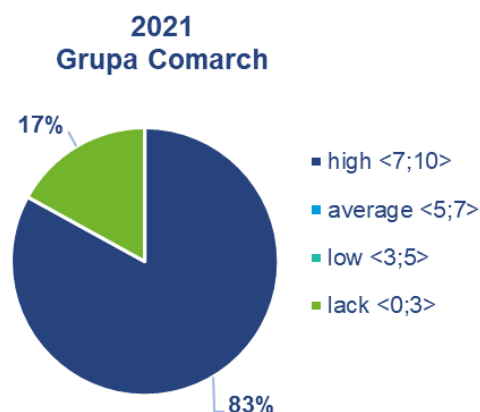
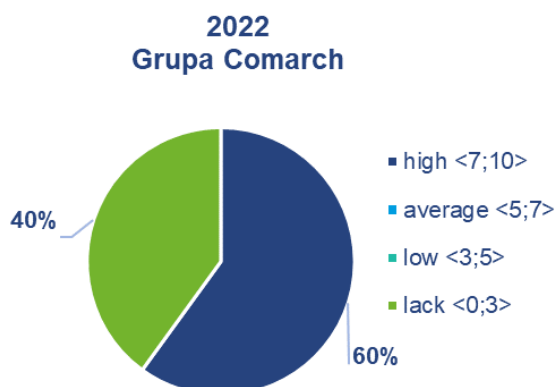
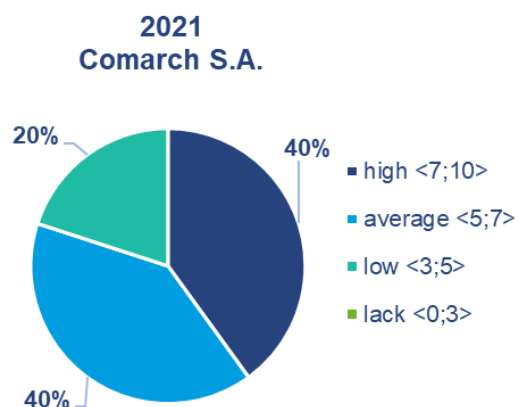
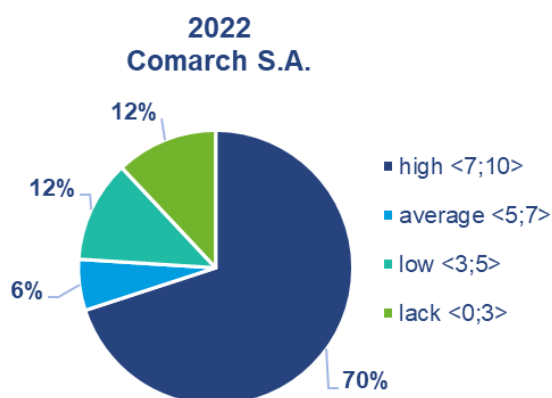
Thanks to the information obtained from the surveys, we can correctly identify and prioritize actions aimed at providing our clients with maximum satisfaction from cooperation with the Comarch Group.

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 S.A. and Comarch Group in 2021 – 2022 was shaped. The indicator of average customer satisfaction consisted of, among others, general satisfaction with cooperation with the Comarch Group, willingness to recommend the Comarch Group products/services to another company, willingness to purchase Comarch products/services in the future, the way how the Comarch Group conducts business talks, negotiations and signing of contracts.



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

Below are presented the highest-rated aspects of the satisfaction level of Comarch S.A. customers and Comarch Group companies:

- Commitment and willingness to help employees,
- Expertise of employees,
- High level of personal culture of employees
- Insightful problem solving,
- Individual approach to the client;

In 2022, customers recognized employee engagement as strengths. They paid particular attention to the satisfactory contact with carers who showed a willingness to help, thorough problem solving and a high level of personal culture. Some of the respondents replied that they would be happy to return to using Comarch products in the future as well as recommend Comarch products to others. One of the weaknesses that customers pointed out was the time of faults/reports.

6. Human Resources

6.1. Employment in the Comarch Group 2018-2022

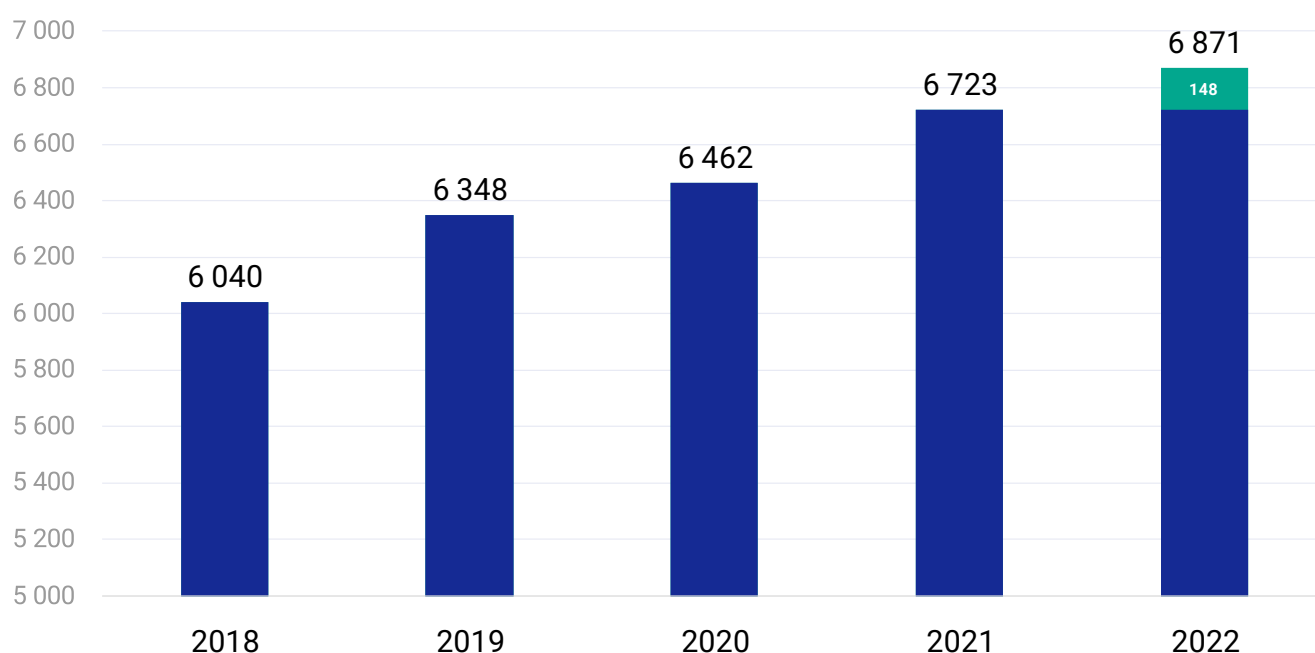
Number of employees

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 2021 branches located in urban centres in Poland. As at 31st of December, 2022, 3,662 employees were employed in Krakow, 2,584 in other cities in Poland and 625 outside of Poland.

As at 31st of December, 2022 at Comarch S.A. 5,469 people were employed compared to 5,206 people employed as at 31st of December, 2021, while in the entire Capital Group the number of employees increased to 6,871 people compared to 6,723 people as at 31st of December, 2021.

The chart below shows the number of people employed in the Comarch Group in 2018 – 2022.



The tables below present the average number of people employed at Comarch S.A. and in the Comarch Group in 2018 – 2022.

Average number of employees in Comarch S.A.	2022	2021	2020	2019	2018
Employment agreement	4,585	4,327	4,117	4,057	3,753
Other form of employment	883	887	925	930	934
Total	5,468	5,214	5,042	4,987	4,687

Average number of employees in Comarch S.A.	2022	2021	2020	2019	2018
Production employees and technical consultants	4,774	4,556	4,395	4,330	4,052
Marketing and sales	217	188	176	180	168
Management and administrative	431	414	413	414	407
Other	46	56	58	63	60
Total	5,468	5,214	5,042	4,987	4,687

Average number of employees in Comarch Group	2022	2021	2020	2019	2018
Employment agreement	5,547	5,427	5,119	5,087	4,727
Other form of employment	1,373	1,360	1,383	1,361	1,364
Total	6,920	6,787	6,502	6,448	6,091

Average number of employees in Comarch Group	2022	2021	2020	2019	2018
Production employees and technical consultants	5,461	5,377	5,136	5,103	4,797
Marketing and sales	383	370	336	321	298
Management and administrative	515	503	499	499	495
Other	561	537	531	525	501
Total	6,920	6,787	6,502	6,448	6,091

Due to the constant development of its activities, both Comarch S.A. and the Comarch Group systematically increase the level of employment.

Employment rotation

S.2.2., S.2.3.

In 2022, 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 keys to Comarch Group's activity.

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

Contracts under which Work is Provided

S.2.1., S.2.4.

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).

The tables below present the number of people employed at Comarch S.A. and in the Comarch Group in the years 2021 – 2022 according to the type of contract under which the work is provided.

Type of employment	Time	Comarch S.A.		Comarch Group	
		2022	2021	2022	2021
Open-ended contract	Part-time	167	159	159	161
	Full-time	2,808	2,643	3,535	3,417
	Total	2,975	2,802	3,694	3,578
Fixed-term contract	Part-time	50	50	63	65
	Full-time	1,551	1,474	1,781	1,775
	Total	1,601	1,524	1,844	1,840
Total		4,576	4,326	5,538	5,418

Type of employment	Age	Comarch S.A.		Comarch Group	
		2022	2021	2022	2021
Open-ended contract	Under 30 years	567	549	681	676
	30-50 years	2,316	2,233	2,785	2,716
	over 50 years	92	20	228	186
	Total	2,975	2,802	3,694	3,578
Fixed-term contract	Under 30 years	1,163	1,173	1,269	1,325
	30-50 years	427	346	545	495
	Over 50 years	11	5	30	20
	Total	1,601	1,524	1,844	1,840
Total		4,576	4,326	5,538	5,418

Type of employment	Sex	Comarch S.A.			Comarch Group
		2022	2021	2022	2021
Open-ended contract	Women	909	830	1,192	1,118
	Men	2,066	1,972	2,502	2,460
	Total	2,975	2,802	3,694	3,578
Fixed-term contract	Women	563	503	666	661
	Men	1,038	1,021	1,178	1,179
	Total	1,601	1,524	1,844	1,840
Other forms of employment	Women	128	115	298	283
	Men	765	765	1,035	1,022
	Total	893	880	1,333	1,305

Total	5,469	5,206	6,871	6,723
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S.2.5.

The number of employees in the Comarch Group as part of outsourcing is a small percentage of all employees.

In 2021 – 2022, all employees employed under a contract of employment at Comarch S.A. and in the Comarch Group were paid higher than the minimum wage.

Employment Structure by Voivodships and Countries

The table below presents the number of jobs created by Comarch S.A. and Polish companies of the Comarch Group in 2021 – 2022 in individual provinces of Poland as of the last day of the year.

POLAND voivodeship	Comarch S.A.		Comarch Group	
	31 December 2022	31 December 2021	31 December 2022	31 December 2021
dolnośląskie	267	252	272	255
kujawsko-pomorskie	23	22	24	23
lubelskie	221	184	230	192
lubuskie	3	5	3	5
łódzkie	338	361	363	368
małopolskie	3,120	3,117	3,708	3,751
mazowieckie	301	288	357	355
opolskie	6	1	6	1
podkarpackie	102	71	116	88
podlaskie	42	33	43	36
pomorskie	99	84	125	118
śląskie	631	490	675	607
świętokrzyskie	59	52	61	55
warmińsko-mazurskie	1	1	1	1
wielkopolskie	256	245	261	251
zachodniopomorskie	-	-	1	1
Total	5,469	5,206	6,246	6,107

Comarch S.A. and the Comarch Group diversifies the risk of restrictions on the availability of human resources by operating in 21 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.

The table below presents the number of jobs created by foreign companies of the Comarch Group in 2021 – 2022 in individual countries as of the last day of the year.

FOREIGN COUNTRIES			
country	31 December 2022		31 December 2021
Saudi Arabia	1		1
Australia	1		2
Austria	11		12

Belgium	22	24
Brazil	7	8
Chile	6	7
Finlandia	1	-
Francja	135	125
Holland	3	2
Japan	7	6
Columbia	2	3
South Korea	3	2
Luxembourg	1	-
Malta	4	4
Mexico	-	1
Germany	235	231
Panama	6	10
Peru	-	3
Russia	1	3
United States	33	22
Switzerland	20	20
Sweden	1	1
Thailand	16	19
Turkey	4	1
Ukraine	67	73
Great Britain	6	11
Italy	22	15
United Arab Emirates	10	10
Total	625	616

A large part of the Comarch Group's revenue comes from foreign markets, so there is a need to obtain human resources also outside Poland. Foreign companies adjust the number of employees to the current contract demand by setting up new subsidiaries and creating new locations around the world. Although in a smaller share than in Poland, however, also abroad Comarch contributes in this way to the development of the regions in which it operates.

Employment Structure by Sex and Age

Composition of Management and Supervisory Bodies by Gender and Age

All representatives of Comarch S.A.'s managing bodies are citizens of Poland. The table below presents the numerical breakdown of supervisory authorities by diversity category in 2021 – 2022.

Year	Management Body	Age	Woman	Man	Total
31 December 2022	Supervisory Board	under 30 years	-	-	-
		30-50 years	2	-	2
		over 50 years	2	2	4
		Total	4	2	6
	Management Board	under 30 years	-	-	-

		30-50 years	-	5	5
		over 50 years	-	1	1
		Total	-	6	6
Total			4	9	13
31 December 2021	Supervisory Board	under 30 years	-	-	-
		30-50 years	2	-	2
		over 50 years	2	3	5
		Total	4	3	7
	Management Board	under 30 years	-	-	-
		30-50 years	-	5	5
over 50 years		-	1	1	
	Total	-	6	6	
Total			4	9	13

The representatives of the managing bodies of the Comarch Group companies are citizens of various countries. The table below presents the structure of management and supervisory bodies by diversity category in 2021 – 2022.

Year	Management body	Age	Woman	Man	Total
31 December 2021	Supervisory Board	under 30 years	-	-	-
		30-50 years	6	18	24
		over 50 years	5	20	25
		Total	11	38	49
	Management Board	under 30 years	3	-	3
		30-50 years	14	105	119
over 50 years		5	25	30	
	Total	22	130	152	
Total			33	168	201
31 December 2020	Supervisory Board	under 30 years	-	-	-
		30-50 years	3	21	24
		over 50 years	4	13	17
		Total	7	34	41
	Management Board	under 30 years	2	1	3
		30-50 years	12	117	129
over 50 years		4	23	27	
	Total	18	141	159	
Total			25	175	200

Other Employees

Below is a breakdown of employees employed under employment contracts at Comarch S.A. and Comarch Group by type of work, gender, age and citizenship.

Comarch S.A. Categories of employees *	2022			2021		
	Woman	Man	Total	Woman	Man	Total
administration	295	79	374	274	77	351
managerial staff	167	495	662	142	473	615
production	925	2,432	3,357	842	2,350	3,192
other	85	98	183	75	93	168
Total	1,472	3,104	4,576	1,333	2,993	4,326

* employed on the basis of employment contracts

Comarch Group Categories of employees *	2022			2021		
	Woman	Man	Total	Woman	Man	Total
administration	410	122	532	405	128	533
managerial staff	224	590	814	209	570	779
production	1,008	2,614	3,622	951	2,588	3,539
other	216	354	570	214	353	567
Total	1,858	3,680	5,538	1,779	3,639	5,418

* employed on the basis of employment contracts

Men constitute the dominant group among employees in Comarch S.A. and in the Comarch Group. This is in line with the specificity of the IT industry, however, the share of women both in total employment and among the managerial staff is increasing year on year, which is consistent with the assumptions of the ESG strategy in terms of diversity, described in point 2.4. of this report.

Comarch S.A. Categories of employees *	2022				2021			
	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	141	216	17	374	136	207	8	351
managerial staff	49	576	37	662	38	572	5	615
production	1,493	1,821	43	3,357	1,495	1,686	11	3,192
other	47	130	6	183	53	114	1	168
Total	1,730	2,743	103	4,576	1,722	2,579	25	4,326

* employed on the basis of employment contracts

Comarch Group Categories of employees *	2022				2021			
	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	181	306	45	532	196	299	38	533
managerial staff	59	666	60	785	47	659	39	745
production	1,621	2,116	140	3,877	1,658	2,023	118	3,799
other	89	242	13	344	100	230	11	341
Total	1,950	3,330	258	5,538	2,001	3,211	206	5,418

* employed on the basis of employment contracts

In 2022, the number of people employed in the age group 30 -50 years old increased the fastest, while the highest growth dynamics occurred in the age group above 50 years.

Categories of employees * Comarch S.A.	2022				2021			
	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	366	8	-	374	346	5	-	351
managerial staff	655	7	-	662	610	5	-	615
production	3,269	82	6	3,357	3,128	57	7	3,192
other	174	8	1	183	159	6	3	168
Total	4,464	105	7	4,576	4,243	73	10	4,326

* employed on the basis of employment contracts

Categories of employees * Comarch Group	2022				2021			
	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	465	51	16	532	464	53	16	533
managerial staff	713	50	22	785	681	43	21	745
production	3,482	285	110	3,877	3,437	263	99	3,799
other	237	74	33	344	235	68	38	341
Total	4,897	460	181	5,538	4,817	427	174	5,418

* 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 in 2022 was at a similar level compared to the last year's level.

Remuneration

S.2.9

The table below presents the ratio of the average basic salary of women to the average basic salary of men by employee category in the years 2021 – 2022.

Categories of employees	Comarch S.A.		Comarch Group	
	2022	2021	2022	2021
administration	91%	91%	91%	94%
managerial	67%	66%	69%	67%
production	76%	76%	77%	76%
other	73%	82%	75%	82%

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.

Holidays and Other Employee Issues

S.2.14.

Comarch S.A. and the Comarch Group supports employees who decide to take parentage and provides the opportunity to return to work after using leaves related to maternity / paternity. The vast majority of employees return to their previously occupied positions after maternity / paternity leave. Comarch S.A. and the Comarch Group make it possible to flexibly adjust the working time to the needs of parenting. The table below presents data on return to work and retention of employment after maternity / paternity leave by employees, broken down by gender in 2021 – 2022.

	Sex	Comarch S.A.		Comarch Group	
		2022	2021	2022	2021
The number of people who took of maternity/paternity leave	Woman	82	98	119	133
	Man	1	5	6	16
	Total	83	103	125	149
The number of people who returned to work after the maternity/paternity leave	Woman	90	87	122	109
	Man	1	5	5	15
	Total	91	92	127	124
Return to work rate ^{a)}	Woman	98%	98%	103%	82%
	Man	100%	100%	83%	94%
Number of people who returned to work after maternity/paternity leave and was still employed for 12 months after returning to work	Woman	72	85	91	104
	Man	4	5	6	8
	Total	76	90	97	112
Employment maintenance rate ^{b)}	Woman	83%	93%	74%	89%
	Man	80%	100%	70%	73%

^{a)} Return to work rate - 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 - 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

The minimum period of standard notice given to employees 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.

In accordance with the applicable law of Comarch S.A., iComarch24 S.A., Geopolis sp. z o.o., Comarch Polska S.A., Comarch Healthcare S.A., CA Consulting S.A., Comarch Infrastruktura S.A., Comarch Finance Connect Sp. z o.o., Comarch Cloud S.A., Wszystko.pl sp. z o.o. and MKS Cracovia SSA implemented Employee Capital Plans managed by Aviva Specjalistyczny Fundusz Inwestycyjny Otwarty PPK managed by Towarzystwo Funduszy Inwestycyjnych Allianz Polska Spółka Akcyjna (formerly: Aviva Specjalistyczny Fundusz Otwarty PPK zarządzany przez Aviva Investors TFI S.A). Employees of some foreign companies of the Comarch Group participate in pension programs appropriate for given countries.

S.2.15.

In Polish companies of the Comarch Group, additional medical packages are a benefit available to people employed under an employment contract (regardless of the duration of the contract and the number of full-time jobs). In foreign companies of the Comarch Group, additional medical packages are provided taking into account local regulations and market practices in this area.

S.2.13

The table below presents the total amount of annual contributions to PFRON (National Disabled Persons' Rehabilitation Fund) in thousands of PLN in the years 2021 – 2022.

In thousand PLN	2022	2021
Comarch S.A.	4,368	3,124
Comarch Group	4,954	3,764

S.3.1., S.3.2, S.3.3, S.3.5, S.3.6, S.4.10.

There are no collective labour agreements or trade unions in the Polish companies of the Comarch Group. In Comarch S.A., on the other hand, a group of 7 Employee Representatives was appointed, who operate on the basis of the Agreement concluded in 2006 and the Act of 7th of April, 2006 on informing employees and carrying out consultations with them. Employee Representatives are selected from among all employees employed under an employment contract. The selection is made by the Company's employees every 2 years. The last elections were held in February, 2022. Elected Employee Representatives are part of accident teams and participate in consultations conducted by the Employer. The most important of them included the selection of the institution managing the Employee Capital Plans (PPK) (2019), the rules of operation and work during a pandemic (2020) and the changes in work regulations: introduction of hybrid work and resignation from the obligatory 30-minute break during work (2021).

The employees of Polish subsidiaries did not express their willingness to appoint their representatives.

There are no trade unions in the foreign companies of the Comarch Group in the DACH region, but there are works councils. Employees elect a works council for a given location to which all employees report. The election of a works council is not compulsory and the decision is made by the employees. Participation in elections is limited by the number of years of service.

Works councils in the DACH area:

- Comarch Solutions GmbH – Innsbruck, the company is also subject to the tariff agreement,
- Comarch Software und Beratung AG - all company locations.

Works councils also function in French companies i.e., Comarch S.A.S., Comarch R&D S.A.S. and 2CSI.

There are no trade unions in Comarch SRL in Italy, while employees are subject to a national collective labour contract, which was created to regulate relations between employees and employers. Collective as it affects all employees in the contractual sector and national as 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 the 'CCNL del commercio' (trade).

Similar sectoral agreements regulating issues such as the minimum wage and the obligation to provide additional benefits to employees are binding for Comarch Sistemas LTDA in Brazil and Comarch Technologies Oy in Finland

In Brazil, the workers' union takes the form of an external structure. At the end of 2022 all the employees belonged to this union.

There are no trade unions in other foreign companies of the Comarch Group. Many companies hold regular meetings with employees, but they are not formalized.

S.3.3.

In the last year, no collective disputes were initiated in any of the Comarch Group companies.

In every investment contract concluded under Polish law, the Comarch Group includes a clause requiring the contractor to comply with basic employee rights. Such provisions include, but are not limited to the obligation to employ employees in accordance with applicable regulations, including the provisions of the Labour Code and implementing regulations to this Act, specifying, in particular, the terms of employment, the rules for the payment of remuneration due to employees and the need to comply with other provisions regulating the principles of work performance. Contractors are also contractually obliged to provide employees with safe

and hygienic working conditions, including compliance with all obligations resulting from OHS regulations. The number of contracts concluded under non-Polish law is small, however, they also contain provisions containing obligations of contractors to comply with local labour law and OHS regulations.

6.2. Training

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 30 years of Comarch experience as a knowledge-based organization. On average approx. 14,000 participants a year participate in over 300 training programs conducted by 90 qualified trainers.

The tables below present the average number of training hours per employee (by gender and employment category) in 2021 – 2022.

Comarch S.A.	2022			2021		
	managers	others	total	managers	others	total
All trainings						
women	9.3	15.1	14.4	2.8	16.5	15.1
men	9.2	22.2	20.1	2.2	22.7	19.7
Total	9.2	19.8	18.3	2.4	20.7	18.3

Comarch S.A.	2022			2021		
	managers	others	total	managers	others	total
Internal trainings						
women	9.2	13.3	12.8	2.5	14.5	13.3
men	9.2	20.2	18.5	2.2	20.7	18.0
Total	9.2	17.9	16.7	2.2	18.8	16.5

Comarch Group	2022			2021		
	managers	others	total	managers	others	total
All trainings						
women	7.2	14.2	15.4	2.4	14.9	15.3
men	7.7	26.4	21.2	2.1	25.5	20.4
Total	7.6	21.6	19.3	2.2	21.6	18.8

Comarch Group	2022			2021		
	managers	others	total	managers	others	total
Internal trainings						
women	7.0	14.9	13.8	2.1	15.2	13.7
men	7.7	21.9	19.3	2.0	21.6	18.5
Total	7.5	19.5	17.5	2.0	19.4	16.9

Number of employees improving their professional qualifications who are entitled to specific rights in this respect in relation to the employer (e.g., training leaves) with an indication of the number of employees co-financed or financed by the employer to improve their professional qualifications:

Comarch S.A.	2022	2021	Comarch Group	2022	2021
All trainings			All trainings		
women	1,192	1,080	women	1,368	1,337
men	3,081	2,837	men	3,396	3,308

Total	4,273	3,917	Total	4,764	4,645
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Comarch S.A.	2022	2021	Comarch Group	2022	2021
Internal trainings			Internal trainings		
women	195	114	women	219	123
men	458	229	men	482	268
Total	653	343	Total	701	391

The Comarch Group has a formalized employee evaluation system, thanks to which the vast majority of employees receive regular assessments of their work results and information on professional development opportunities.

6.3. Internship Program

Last year, the 20th edition of the Comarch IT internship took place, which is the largest project of this type in Europe. The summer internship program is addressed to students of the best technical universities in Poland. . The involvement of the entire company in accepting interns means that the refined formula of the internship program is developed and enriched with new elements. As a result, the internship program enjoys great interest and an excellent reputation among IT students and related areas.

Every year, the interest of students translates into a large number of applications. 3,500 candidates applied for participation in the internship program in 2022.

In the recruitment process, the candidates first faced tests. The knowledge and competences of students who obtained the best results in the tests were additionally verified during recruitment interviews conducted by future superiors .

311 people took part in the 20th edition of Comarch's internship program in 2022. The internship took place in 14 cities in Poland, and students had a choice of 7 IT profiles: programming, system engineer/ DevOps, Embedded, telecommunications, AI / ML, Cyber Security and mobile applications and UX/UI internship, which was very popular again. For 3 months of paid internship, students worked in teams of several people under the guidance of experienced Comarch employees who acted as supervisors of internship groups. It is the experience, competences, preparation and talent for transferring knowledge by interns that interns particularly appreciated. They emphasized that due to the nature of the work, the opportunity to learn about complex

applications and databases, the internship is a unique experience, impossible to repeat in the case of projects organized as part of university classes.

"I really enjoyed the internship, I took part in creating interesting applications. I participated in demanding projects, thanks to which I could deepen my knowledge in a short time. The atmosphere in the team where I worked was always friendly, everyone was willing to help." - Anna, participant of an internship on a programming profile in Krakow.

After the end of the summer program, 83% of the trainees were employed in Comarch, under conditions enabling them to adjust their work to the classes at the university.

6.4. Occupational Health and Safety (OHS)

System of Supervision and Accident Investigation

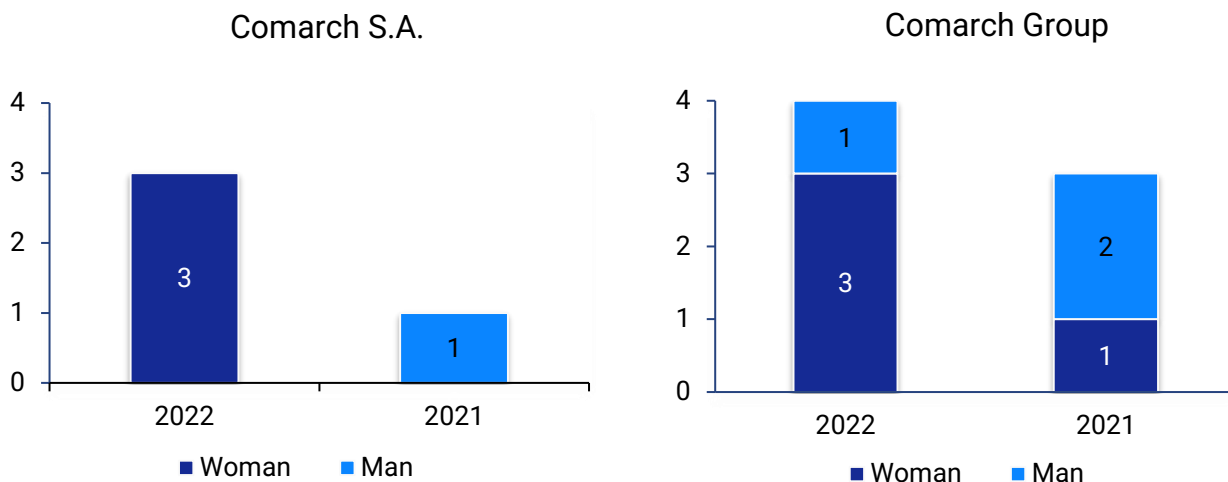
S.4.1., S.4.2., S.4.3., S.4.4., S.4.5., S.4.9

In the Comarch Group, the circumstances and causes of accidents at work are determined by a two-person post-accident team appointed for this purpose by the Employer, which includes an employee of the OHS Service and an Employee Representative, in accordance with applicable regulations. Protocols determining the circumstances and causes of accidents at work are approved by the Employer or an authorized person. The method of reporting and registering accidents at work is described in internal procedures developed on the basis of applicable legal requirements. Both the established causes of the incident, the circumstances of its occurrence, as well as the conclusions and recommended preventive measures are communicated to the employees. In addition, the Quality and Health and Safety Department conducts educational campaigns aimed at increasing employees' awareness of hazards in the workplace, promoting good health and safety practices and a culture of work safety.

Accidents at Work

In 2022, 4 events took place in the companies of the Comarch Group, 2 of which were recognized as accidents at work and the remaining 2 as accidents treated on an equal footing with accidents at work (the events took place during a business trip).

The charts below show the number of accidents at work in Comarch S.A. and in the Comarch Group in 2021–2022.



All 4 incidents were classified as light and individual accidents.

Summary of Data on Accidents at Work in 2021-2022

In the Comarch Group, for statistical purposes, the following accident rates are used:

- accident frequency index, expressed as the ratio of the number of accidents to the number of working people (per 1,000 people), and
- accident severity index, expressed as the ratio of the number of days lost due to accident absenteeism to the total number of accidents (this index does not include fatalities victims)

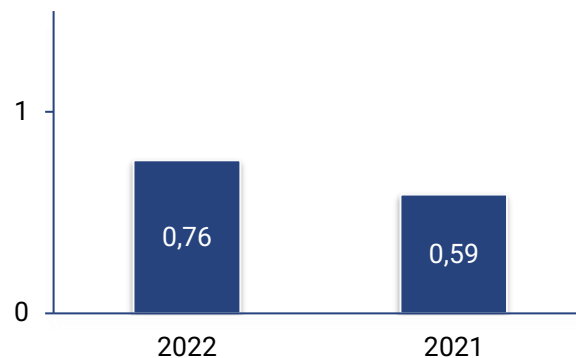
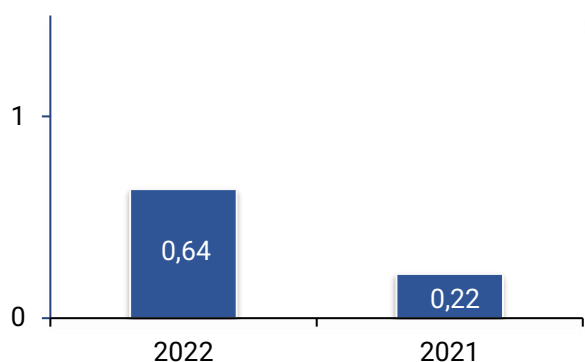
The table below presents the accident rates for the Comarch Group and Comarch S.A. in the years 2021 – 2022.

Year	Number of accidents		Number of days of sick leave		Frequency rate		Severity rate	
	Comarch S.A.	Comarch Group	Comarch S.A.	Comarch Group	Comarch S.A.	Comarch Group	Comarch S.A.	Comarch Group
2022	3	4	12	12	0.64	0.76	4.00	3.00
2021	1	3	-	57	0.22	0.59	0.00	19.00

In 2022, the number of accidents at Comarch S.A. and in the Comarch Group increased compared to 2021. In 2022, the number of absenteeism days due to accidents at work decreased from 57 days to 12 days - for the entire Comarch Group. The charts below show the accident frequency rate for Comarch S.A. and the Comarch Group in 2021– 2022.

Comarch S.A.

Comarch Group

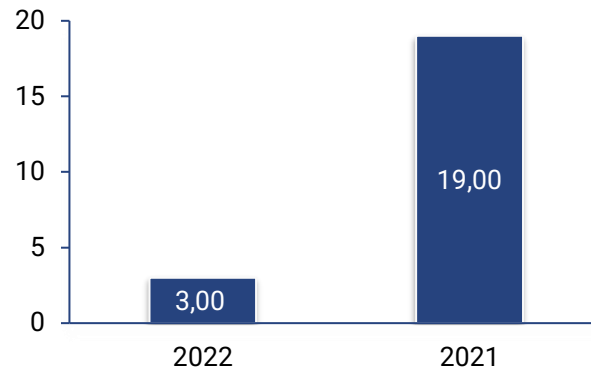
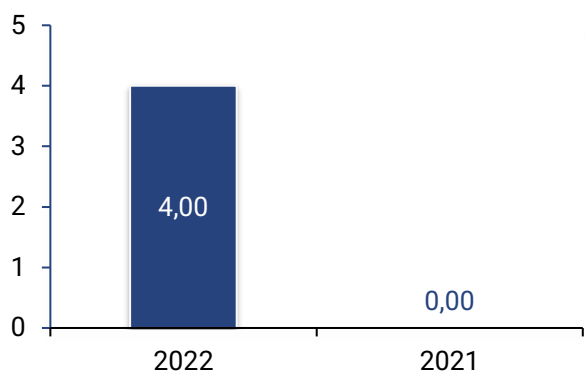


The rate of accidents at work in 2022 at Comarch S.A. was 0.64, while for the entire Comarch Group it was 0.76. Comparing to 2021, an increase of this ratio was recorded in Comarch S.A. and Comarch Group

The charts below show the accident severity rate for Comarch S.A. and the Comarch Group in 2021 – 2022.

Comarch S.A.

Comarch Group



Accident severity rate at work in 2022, for Comarch S.A., was 4.00, while for Comarch Group was 3.00. Comparing to 2021, an increase in Comarch S.A. was recorded and a decrease in Comarch Group.

S.4.6, S.4.7, S.4.8

In the companies of the Comarch Group, neither the cases of occupational diseases nor jobs with positions exceeding NDN (maximum allowable intensity) and NDS (maximum allowable concentration) for harmful factors identified at workplaces have been reported so far. In addition, an occupational risk assessment was carried out for all workplaces in accordance with the Polish standard PN-N 18002: 2011 Occupational health and safety management systems - General guidelines for occupational risk assessment. The risk analysis and assessment showed that the impact of the identified threats on the health and safety of employees is at an acceptable level.

Fire Protection and First Aid

The Comarch Group ensures compliance with technical, construction, installation and technological fire protection requirements in all its buildings. It undertakes to provide fire-fighting devices and extinguishers, as well as their maintenance and repair for their efficient and reliable functioning. The fire-fighting procedures have been established for all employees. The Comarch Group has Rescuers in all its branches, of whom there are 138 in total. Rescuers are employees (volunteers) trained in the principles of first aid and emergency evacuation. Every 2 years, training is organized for Rescuers on first aid and on the rules of conduct in the event of fire and evacuation. The trainings are aimed at preparing new Rescuers for their role, and in the case of other Rescuers - refreshing and systematizing the knowledge and providing information on possible changes in first aid standards, as well as organizational changes in the field of evacuation. The last training took place in July, 2021, and 57 people took part in it. The next training is planned for 2023.

All the employees have an access to the first aid kits. Each employee is required to read the current version of the Fire Safety Instructions,. Trial evacuations are carried out in all locations.

6.5. Activities of the Comarch Group in the Fight Against the Covid-19 Pandemic

Comarch Group constantly monitors the development of the situation related to the persistent effects of the spread of the SARS-CoV-2 coronavirus and COVID-19 cases.

All guidelines recommended by the Chief Sanitary Inspectorate and other state institutions have been implemented, activities as part of operational activities, due to recommendations regarding the health and hygiene of employees. . Business trips to countries identified by the Chief Sanitary Inspectorate as high-risk countries have been suspended. Direct contacts between employees within the organization have been limited, a large-scale remote work mode has been launched for office workers, and all hygiene recommendations are applied in Comarch offices. Remote communication methods are widely used in business contacts. Management Board of Comarch S.A. points out that the Company's operations are very well diversified in terms of industries, products and geographies, and the effects of the pandemic do not pose a threat to the company's financial stability.

In 2022, the Comarch Group organized another COVID-19 vaccination campaign for employees, associates and their family members.

7. Activities for the Benefit of Society

S.9.3.

From the very beginning, the Comarch Group has been widely involved in the implementation of the concept of Corporate Social Responsibility (CSR), promoting the idea of creating a broad social platform. The activities promoting sport, the latest IT technologies, healthy lifestyle and environmental protection, support for those in need, help for animals, as well as involvement in culture and support for local community initiatives are important.

The foundations of CSR in the Comarch Group are the basis for activities in the area of social responsibility. The Code of Ethics was also adopted and functioning in the company. A detailed report on CSR in the Comarch

Group is annually documented and presented in the Comarch Group's corporate social responsibility report, which is available on the Internet at: <http://www.comarch.pl/o-firmie/zrownowazony-biznes/csr/> (ENG: <https://www.comarch.com/company/corporate-social-responsibility/>).

The Company does not have its own code of ethics in marketing communication, however, it adheres to the basic principles of ethics in matters of responsible marketing communication. Marketing activities undertaken by the Comarch Group do not contain discriminatory content, in particular due to race, religious beliefs, sex or nationality, and do not contain elements that encourage acts of violence. Comarch Group advertisements must not mislead the recipients and must be implemented in an understandable manner. The sponsorship of the Comarch Group and related contracts must be carried out in a way that is easy to read and understand by the environment, and must not violate good manners.

An e-mail address has been created for communication and the possibility of reporting new issues in this area: csr@comarch.pl.

7.1. Activities for the Local Community

S.9.1., S.9.2.

The operational activity of the Comarch Group does not cause any nuisance to the local community and does not pose a threat to its safety. In 2022, there were no complaints reported by the local community.

The Comarch Group engages in various activities aimed at supporting the local community, actively supports environmental protection in its immediate vicinity and works to popularize science. Many initiatives and undertakings are carried out by MKS Cracovia SSA.



Comarch Plays with Last Night of the Proms

Again, Comarch provided financial support the Krakow edition of the Last Night of the Proms event, which combines the highest artistic level with the spontaneous behaviour of the audience who sings songs from the last songs of the program. The concert took place at the Krakow Opera, and the soloists were accompanied by the Beethoven Academy Orchestra and Krakow Opera Choir. The program includes, among others compositions by Williams, Puccini, Wood and Komasa-Łazarkiewicz. The concert was organized for the 26th time.

Organ music

For several years, the company has been involved in the projects of St. Mary's Basilica in Krakow, aimed at promoting organ music. In 2022, Comarch financially supported the organization of St. Mary's Organ Concerts.

They Shared What is Most Valuable - the Blood Donation Campaign

In response to the needs of the regional blood donation center, another blood donation campaign was organized on the company's campus in Krakow, in which employees participated, donating a total of 13,700 ml of blood. The action was organized in cooperation with the iMed24 Medical Center and the Regional Blood Donation and Treatment Center in Krakow.

We support DKMS

Every 40 minutes in Poland and every 27 seconds in the world, one person learns that they have blood cancer. Bone marrow donor days were organized in the Krakow and Warsaw branches of the company, during which an

educational campaign was conducted, and willing people could register in the database of potential bone marrow donors.

For Pets

Organizations that help homeless animals also need help. In 2022, Comarch organized material collections for foundations or associations from several Polish cities. Thanks to the involvement of employees, it was possible to support, inter alia, Shelter for Homeless Animals in Wrocław, Białystok, Poznań, Katowice, Gdańsk, Gliwice and Krakow Society for the Care of Animals or The Better World Foundation in Cieszyn.

Christmas Help

As in previous years and in 2022, employees from Polish companies of the Comarch Group in branches all over Poland joined the organization of Christmas material collections for people in need. Support was given to over a dozen organizations and institutions, including: the Care and Educational Center in Kęty, the Hospice of St. Łazarza, Center of Care and Educational Institutions "Parkowa", , Lublin Hospice of the Little Prince for Children, Sociotherapeutic day room in Poznań, Podkarpackie Hospice for Children or Children's Home in Łódź.

IT Equipment for Those in Need

In 2022, Comarch S.A. made a donation of several hundred pieces of computer equipment, incl. for the Stefan Żeromski Hospital, numerous schools, communities, orphanages, and other public benefit organizations.

Support for the Full Life Foundation

Support for the Full Life Foundation Comarch supported the Full Life Foundation in the form of free assistance to Comarch ERP Optima from the 1st of November, 2021 and access to e-learning training in the field of human resources and payroll as well as in the field of accounting.

7.2. Popularization of Science and Education

From the beginning of its activity, the Comarch Group has been actively cooperating with schools, universities and other educational institutions, including: AGH University of Science and Technology, Wrocław University of Technology, Śląsk University of Technology, Jagiellonian University, Łódź University of Technology, and the University of Economics in Kraków.

Last year, Comarch specialists also took part in various meetings with students in Poland and abroad, and in career days in Poland, France and Belgium. The company also supported financially or substantively the organization of the Cerebro and Click student conferences, technology meetups or UX Poland - one of the largest conferences for designers in Europe.

In individual departments, employees' initiatives are also created, which involve devoting time to students at dedicated courses or industry meetings and meetings with research clubs.

Additionally, Comarch specialists are eager to share their knowledge by creating many expert articles and original podcasts.

In 2022, a partnership with the AGH University of Science and Technology in Krakow was also continued in the field of postgraduate studies in "Financial Analytics and Industrial Process Controlling".

The company also organizes internal knowledge exchange campaigns, including meetups or series of texts in the field of cybersecurity, created by specialists from the Internal Security Department.

During the gala of the 10th anniversary of the Lublin IT Upland, the Mayor of the City of Lublin presented i.a. a medal for the Comarch representative in recognition of the company's full commitment to the development of the Lublin ICT sector and co-creation of a strong IT ecosystem in Lublin.

Summer student internship program

The 20th edition of the IT internship took place during the summer holidays. It is one of the largest projects of this type in Europe. Details on the internship program are described in section 6.3.

Comarch for Education

Comarch popularizes knowledge about ERP systems among economic universities and vocational schools. This activity is carried out through:

- lectures by employees at universities on topics related to IT, technology and economics,
- lending of Comarch ERP systems in educational versions (over 650 educational facilities and institutions equipped with educational versions of Comarch ERP),
- training in Comarch ERP systems for pedagogical staff,
- other educational programs for students of economic faculties.

We also distribute special workbooks, dedicated to vocational education, preparing for state vocational examinations on the economist technician profile.

Comarch Innovation Zone



The Comarch Innovation Zone, operating since 2018, is a space which presents the technological achievements of the Comarch Group in the field of IT systems, telecommunications, the Internet of Things and artificial intelligence. Separate areas of the Zone are dedicated to individual sectors of the economy for which the Comarch Group designs and implements innovative solutions. Visitors have the opportunity to learn about solutions such as Virtual Reality, industry 4.0 and telemedicine.

Before the COVID -19 pandemic, the Innovation Zone could be visited not only by business partners. Organized tours, the possibility of

communing with modern technologies and expanding knowledge were friendly conditions for school and academic groups. Trips to the Innovation Zone were an excellent opportunity for young people to inspire discussions about the future, choice of studies or career paths. During the tours, the students were eager to interact with modern solutions, asked a lot of questions, and deepened their knowledge and interests. During the epidemic, the Innovation Zone operated to a limited extent, its full scope was resumed in the spring of 2022 after the covid restrictions were lifted.



A visit to a space full of innovative solutions can be a unique experience, regardless of age. The Comarch Innovation Zone was also visited by the students of the University of the Third Age. The latest solutions turned out to be familiar to them - they were an impulse for a lively discussion about the activities of the Comarch Group and further technological development.

The Comarch Innovation Zone promotes and teaches. A modern, multimedia space encourages interaction with new technologies and facilitates the organization of knowledge. It is a place for meetings and exchange of ideas, and at the same time an exhibition area presenting a vision of the future, extremely attractive and valuable for visitors.

Support for the Polish School in Lille (France)

Students from the Polish School in Lille received computer equipment, transport bags and audiovisual materials from the employees of the French office of Comarch. The gifts were handed over in April 2022 during the students' visit to the company's headquarters. The guest of honor of the meeting was Mr. Andrzej Szydło, Consul of the Republic of Poland in Paris.

7.3. Sport and Healthy Lifestyle

For almost 30 years, the companies of the Comarch Group have been actively involved in promoting sport and an active lifestyle among young people and the inhabitants of the Małopolskie Voivodeship. Since 2002, the company has been the titular sponsor of the oldest, existing football club in Poland, and the five-time Polish Champion - Cracovia, including the hockey section. The company also promotes an active lifestyle among its employees. The Comarch Recreation Centre is at the disposal of employees of the Comarch Group companies in Krakow and their families.

Sponsoring Slask Wroclaw

Comarch, together with Infortes, were partners of the Ekstraklasa basketball team Śląska Wrocław in the 2021/2022 season. The team from the capital of Lower Silesia won the title of Polish Champion for the eighteenth time in the history of the club.

Sponsorship of Royale Union Saint-Gilloise SCRL

In July 2022, Comarch became a sponsor of the Royal Unions Saint-Gilloise football club from the Belgian top league. The company supports footballers in 2022/2023. The sponsorship of the team from the Brussels-Capital Region aims to create cooperation on a wider scale, which will contribute to building even greater recognition of the Comarch brand in the Kingdom of Belgium. Comarch is the largest Polish investor in Belgium, and the Benelux region is one of the most important markets for the entire Comarch group.

Sponsorship of a hockey team in Switzerland

The company will support 300 young players in the U9, U11, U13, U15, U17A and U20A age groups for at least three years. These strong youth teams make the EVZ an important institution in Swiss amateur and professional sports. The club especially promotes young talents who aim to pursue a career in professional hockey and provides many young people with a sensible and active way to spend their free time.

Cycling to Work



The Comarch Group has been encouraging employees to use bicycles as an alternative means of transport for many years, providing bicycle infrastructure (e.g. stands, lockable bicycle storage, repair stations, locker rooms with showers) and occasional actions related to bicycles (organization of bicycle services for company employees or "Bikes & Breakfast" event which was held once again in the Polish branches of the company) .

Once again, the company joined the Małopolska campaign "Cycling to work, that is - home, bicycle, work ... and so on and on" organized by the Municipal Economy Department of the Krakow City Hall. In the action aimed at promoting the bicycle as an everyday means of transport, Comarch employees participated from June to the end of October, adding their green brick in the fight for a cleaner

environment. Regular cycling to work is possible thanks to the infrastructure provided by Comarch. The Polish

branches of the company include, among others, lockable bicycle rooms, stands, changing rooms with showers and self-service repair stations.

Cycling campaigns organized in the company are part of the environmental policy, which is part of the company's strategy and management model.

We Run and Help

After a break related to the pandemic, in 2022 employees from various branches returned to more intensive participation in external sports events, some of which were of a charity nature, such as Poland Business Run, Give a fiver for a kid or the IT Championship football tournament in Lublin. Among other dozens of events on which Comarch teams appeared, one can mention, among others, Cracovia Półmaraton Królewski, Biegnij Warszawo, 4Rest Run, Eco Run, Wild Run, Runmagedon, Bieg Niepodległości, Szczęśliwa 13 or Bieg Powstania Warszawskiego.

Charity Sports Competition

Two months of competition, two tasks to be performed, two categories, one common goal - financial support for a selected aid organization. Last year's Comarch ONrun / ONbike / ONmove competition was attended by several hundred employees who travelled and ran almost 65,000 km in total. Thanks to the involvement of employees, we managed to achieve the goal and financially support the Empowering Children Foundation, which protects children from harm and helps those who have experienced psychological, physical and sexual abuse.

Catch the balance

Good energy of employees is the basis of a well-functioning organization. That is why, especially in 2022, the wellbeing program was continued at Comarch - Catch the balance - body, emotions, healthy lifestyle. Webinars with experts in mental health and diet, exercises with physiotherapists, articles on a healthy diet, work ergonomics and time planning were organized.

Academy of e-Health Managers

Academy of e-Health Managers is a mailing course initiated by Comarch Healthcare in 2022. The project was created from the need to share practical, key knowledge in the field of healthcare digitization with a really wide group of recipients who have one thing in common - operating in the healthcare sector. During the course, we discussed topics such as: law, Electronic Medical Records (EDM), artificial intelligence and telemedicine. Each of the planned lessons has been meticulously prepared in cooperation with industry experts, so that it is an inspiring material for both the directors of medical facilities and medical staff, physiotherapists, as well as students of medicine and nursing.

Soccer struggles

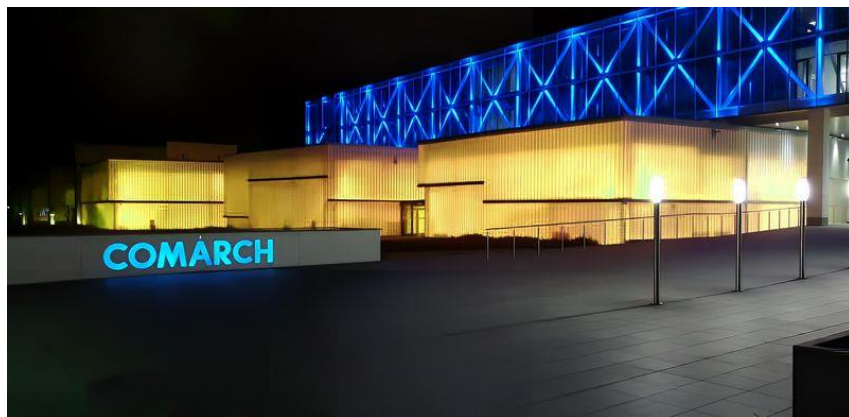
The company tries to encourage employees to be physically active also in other disciplines than running or cycling. More than a dozen teams composed of Comarch employees from various departments took part in the September Comarch Mundial tournament. All-day football games were held at the Cracovia Training Center in Rączna.

Family

After a break related to the pandemic, Megapiknik was organized again - an integration event for employees and their families. The event took place at the Cracovia Training Center in Rączna and was accompanied by various attractions for both children and adults.

7.4. Comarch for Ukraine

The Comarch Group fully expresses its solidarity with the Ukrainian nation in the face of unjustified Russian aggression. On February 24, 2022, the company launched an organized action to support the arrival to Poland and provide a stay for its employees from Ukraine with their families. Dozens of people, mainly women and children, were helped. The company provided employees of Ukrainian branches with long-term support and signed employment contracts with them in Poland.



At the same time, the aid was addressed to all citizens of Ukraine. The company provided support in all possible forms, e.g. by direct financing of supplies of materials needed in Ukraine, the use of a car fleet to organize transport, by providing business apartments, medical care at the iMed24 Medical Center, Comarch recreational infrastructure, as well as assistance in organizing a stay in Poland for people coming from Ukraine. The company also organized and carried out the transport and accommodation in Germany and Italy of 250 children with cancer from the destroyed children's oncology hospital in Kiev.

In 2022, the Comarch Group ceased operations in Russia due to the military operations in Ukraine and the sanctions being introduced. The continuity of project implementation in Ukraine was maintained and new contracts with Ukrainian clients were concluded. The effects of the conflict did not have a significant negative impact on the company's economic situation, as customers from Ukraine and Russia before the outbreak of the war accounted for approximately 1.5 percent of the Group's sales revenues.

Employees of the company organized material collections for citizens of Ukraine.

MKS Cracovia SSA also contributed to helping Ukraine

#IN SOLIDARITY WITH UKRAINE

The 23rd round of PKO BP Ekstraklasa was played under the slogan #SolidarniZUkrainą. Due to Russia's aggression against Ukraine, Comarch together with MKS Cracovia SSA also showed solidarity with Independent Ukraine in these difficult times.



Before the match against Bruk-Bet Termalica Nieciecza, as an expression of support for Ukraine, Comarch and MKS Cracovia SSA prepared a special playlist. All the songs played by the announcer from the loudspeakers during the warm-up were exclusively by Ukrainian artists. What's more, in front of the Stadium, a collection of articles for people most affected by the war was carried out. It was an

expression of support for the Ukrainians. The players of MKS Cracovia SSA went out in dedicated T-shirts to

warm up before the meeting. In addition, throughout the match, the players wore armbands in the colors of the Ukrainian flag.

"We with you" campaign

In connection with Russia's aggression against Ukraine, Comarch together with MKS Cracovia SSA launched a campaign expressing support for Ukrainian citizens. The carriers displaying the prepared content were located in the main points of the city and at the Main Railway Station in Krakow. What's more, such a message was also displayed on LED carriers from the home match against Bruk-Bet Termalica Nieciecza.

"Polish football for Ukraine" campaign

Comarch, together with MKS Cracovia SSA, provided promotional support for the initiative of the Polish Football Association - an online fundraiser, which was carried out in cooperation with the Polish Red Cross.

7.5. Other activities carried out in 2022 by MKS Cracovia SSA

In 2022, there were many activities for Corporate Social Responsibility. Comarch Cracovia, despite the difficult circumstances at the beginning of this period, related to the outbreak of the armed conflict in Ukraine, created good CSR practice using the club brand. In later months, the activities of the Cracovia brand in PKO BP Ekstraklasa and in the games of the Polish Hockey League and the Continental Cup could even more widely promote practices for the responsibility of enterprises for their impact on society. **Great Orchestra of Christmas Charity**

Supporting the Great Orchestra of Christmas Charity foundation is already a great tradition at Comarch. In 2022, a commemorative PIN of Cracovia for the 115th anniversary of the club and a medal for the Polish Vice-Championship in ice hockey for Comarch Cracovia were donated to the auction. All proceeds were donated to help treat children. **Extrahelp**

Comarch, together with MKS Cracovia SSA, continues to actively participate in the Extrahelp campaign, which involves mutual promotion of charity collections and donating memorabilia for auction by all teams participating in Ekstraklasa top league games. In 2022, on behalf of the Club, we helped the sick Oliver.



International Day Against Racism

Part of the tradition of the oldest sports club in Poland is respect for multiculturalism.

Comarch together with MKS Cracovia SSA say a firm no to racism on the International Day for the Elimination of Racial Discrimination and every other day of the year. **Day of Combating Discrimination of Disabled Persons**

MKS Cracovia SSA, also remembered about the Day of Combating Discrimination of Disabled Persons. This day was meant to encourage reflection on the situation of people with disabilities in Poland, as well as a chance to express opposition to discrimination against people with disabilities in workplaces or offices.

Extra Class Academy



Comarch, in cooperation with MKS Cracovia SSA and the Ekstraklasa Foundation, once again organized the Extra Class Academy tournament. The event is aimed at young people aged 11-12 and its aim is to promote physical activity among young people.

Teddy Bear Game

Cracovia organized the first action of this type on Polish Ekstraklasa pitches - "Teddy



Bear Game". Fans who came to this match brought stuffed animals with them, which flew onto the pitch after the goal.

The teddy bears collected during the campaign went to small patients of the University Children's Hospital in Krakow - Prokocim.

"Striped" Children's Day

Children's Day in Cracovia is an inseparable tradition of the club in the month of June. Thanks to Comarch, the youngest fans could enjoy e.g. a tour of the Stadium, a raffle, "dmuchańce" or demonstration trainings and the Cracovia Kids tournament.

The #PasiastaWizyta and #PasiasteLekcjeWF projects

The campaign conducted in schools and kindergartens in the city of Kraków and throughout the Małopolskie Voivodeship was aimed at presenting fair-play attitudes by the players of Pasy and promoting love for sport and movement. The campaign, which has been taking place regularly for many years, and was interrupted by the coronavirus pandemic, reappeared in 2022 as a permanent point of marketing campaigns. Football players visited school and early childhood facilities at least twice a month, reminding the children present there of healthy competition, mutual respect, and eliminating all signs of racism in sport. At the meetings, exemplary warm-up exercises for professional athletes, adapted to the level of teenagers, are also presented.

Action "Striped" Foretaste of Christmas

One of the club's values is respect for tradition. In accordance with the guiding goal, an event was organized for families with children who like to celebrate the holiday season. A week before Christmas, a dedicated event was held at the Stadium at Kałuży Street, during which children could create their own Christmas decorations with romantic Christmas carols and Christmas songs, which were then hung on the Christmas tree in the VIP area. The most original Christmas decorations were appreciated and the best could win one of several dozen prizes. They included, among others, participation in the children's escort before the start of the Pasy match, or a few copies of the latest football games in which you can lead Cracovia to great successes. In addition, those willing could also get to know the nooks of the facility that are inaccessible on a daily basis thanks to the possibility of visiting the stadium.

Szlachetna Paczka (Noble Package)

As every year, the Club supported the popular all over Poland campaign to help those in need. Creating the image of Cracovia as a socially responsible sports organization consisted in this case in purchasing the necessary goods by footballers and hockey players, and then handing them over to persons indicated by the Szlachetna Paczka. In 2022, we helped a family of several people from Krakow, which was extremely grateful for the help.

Action "Classes in Stripes"

After the Covid break, the action has returned, which aims to disseminate the idea of safe cheering at stadiums and to promote a sports and healthy lifestyle among children and youth. The "Classes in Stripes" campaign is addressed to schools, educational institutions and sports schools, which are invited to matches for the Family Sector for free.

Supporting the activities of the Polish Red Cross

Comarch actively supported the activities of the "Polish Red Cross", consisting in providing humanitarian and social aid, teaching first aid, providing medical security at mass events and promoting honorary blood donation. During ice hockey matches, PCK volunteers at specially prepared stands together with Club employees sensitized the public to the above-mentioned ideas and values.

Promoting fair-play rules at the Canpack 2022 tournament

During the March ice hockey tournament in the junior student category, Comarch Cracovia conducted a number of workshops for young players, emphasizing the importance of a sports lifestyle and fair play rules among the youngest.

Polish Day during the Continental Cup Tournament in Aalborg

Comarch, together with MKS Cracovia SSA, was actively involved in the promotion of Polishness during the Continental Cup Final in Danish Aalborg. Players, coaches and employees of the Club promoted national colors, traditions and culture during meetings with the local population.

Hockey "Classes in Stripes"

Organized school groups appeared at Comarch Cracovia matches. The action, similarly to the football campaign, is aimed at supporting cultural cheering at sports facilities.

Special Olympics

The club joined another campaign of the titular sponsor of PKO BP Ekstraklasa, this time involving the promotion of the European Football Week of the Special Olympics. The action was aimed at promoting the game of football among people with intellectual disabilities, as well as encouraging them to support and cheer for the participants of the competition.

7.6. Donations and Sponsorship

S.9.4.

In 2022 the Comarch Group made donations for social purposes with a total value of PLN 1,185 thousand, and the greatest recipients were the Agency for the Development of the City of Krakow and the Association of Friends of the Stefan Żeromski Specialist Hospital Independent Public Healthcare Center in Krakow. In addition, as in the previous year, the Comarch Group responded to social needs on an ongoing basis, providing schools and public benefit organizations with nearly 300 pieces of electronic equipment (computers and monitors) needed to organize distance learning.

The table below shows the total amount of donations for social purposes provided by Comarch S.A. and the Comarch Group in 2021– 2022.

in thousands PLN	2022	2021
Comarch S.A.	280	1,185
<i>the largest recipients</i>	<i>Stowarzyszenie Przyjaciół Szpitala Specjalistycznego im. Stefana Żeromskiego SP ZOZ w Krakowie</i>	<i>Agencja Rozwoju Miasta Krakowa (Krakow City Development Agency)</i>

	(Association of Friends of the Stefan Żeromski Specialist Hospital Independent Public Healthcare Center in Krakow)	Stowarzyszenie Przyjaciół Szpitala Specjalistycznego im. Stefana Żeromskiego SP ZOZ w Krakowie
	Muzeum Polskie w miejscowości Rapperswil w Szwajcarii (The Polish Museum in Rapperswil, Switzerland)	(Association of Friends of the Stefan Żeromski Specialist Hospital Independent Public Healthcare Center in Krakow)
Comarch Group	351	1,204
	Ministry of Health of Ukraine National Children's Specialized Hospital	Agencja Rozwoju Miasta Krakowa (Krakow City Development Agency)
<i>the largest recipients</i>	Stowarzyszenie Przyjaciół Szpitala Specjalistycznego im. Stefana Żeromskiego SP ZOZ w Krakowie (Association of Friends of the Stefan Żeromski Specialist Hospital Independent Public Healthcare Center in Krakow)	Stowarzyszenie Przyjaciół Szpitala Specjalistycznego im. Stefana Żeromskiego SP ZOZ w Krakowie (Association of Friends of the Stefan Żeromski Specialist Hospital Independent Public Healthcare Center in Krakow)

S.9.5.

The table below shows the total amount spent by Comarch S.A. and the Comarch Group in 2021 – 2022.

In thousands PLN	2022	2021
Comarch S.A.	6,658	6,620
<i>the largest sponsored partners</i>	MKS Cracovia SSA Last Night of the Proms of Cracow	MKS Cracovia SSA Last Night of the Proms of Cracow
Comarch Group	7,248	6,662
<i>the largest sponsored partners</i>	MKS Cracovia SSA Hockey clubs EVZ Kristall-Club Zug and EVZ Nachwuchs AG	MKS Cracovia SSA Hockey clubs EVZ Kristall-Club Zug and EVZ Nachwuchs AG

S.9.6.

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

8. Environmental Protection

8.1. Environmental Management System and Energy Management System

Integrated Management System Policy and procedures within the implemented systems oblige Comarch Group to take active measures to reduce the negative impact on the natural environment. As part of the implemented Environmental Management System in accordance with the requirements of ISO 14001, Comarch has identified environmental aspects that are monitored by the organization on an ongoing basis.



All the Companies of the Comarch Group comply with local legal provisions regarding environmental protection. The Comarch Group consciously reduces the negative impact of its operations on the natural environment by reducing the consumption of natural resources and reducing the generation of waste resulting from current operations. It also promotes an ecological lifestyle among its employees, running campaigns to encourage active participation in environmental protection.

Large-scale environmental reporting shows to what extent Comarch S.A. and companies of the Comarch Group use resources and affect the environment. Every

year Comarch S.A. defines new environmental goals and summarizes the achieved ones.

As part of the implemented Energy Management System compliant with the requirements of the ISO 50001 standard, Comarch S.A. focused primarily on obtaining data on the basis of which the energy efficiency of the company can be assessed and actions aimed at improving the energy efficiency of the company, mainly in the areas of the so-called significant energy consumption (electricity, heat, fuel - petrol and diesel oil). These activities include the modernization of buildings and equipment, the use of renewable energy sources, the use of appropriate purchasing policy, fleet modernization policy, as well as conducting awareness campaigns among employees and continuous monitoring energy performance indicators. The listed activities are subject to periodic monitoring during energy inspections carried out by the Energy Management Team appointed for this purpose.



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

Areas of valuable nature are not in the vicinity or the sphere of influence of Comarch. Comarch's operations do not cause significant environmental losses.

The Comarch Group constantly monitors air pollution (PM10, PM2.5, PM1 dust) with a sensor installed on one of buildings located in the Special Economic Zone in Krakow. The sensor is included in the Airly sensor network which helps to create a national measurement network monitoring smog

8.2. The Use of Natural Resources

E.1.1., E.1.2.

Due to the fact that the Comarch Group is a producer of software and information systems, the company's activity is not related to the direct use of natural resources. On

the other hand, it uses typical media used during the current operation (electricity, heat and water). Among the natural resources used for the current operations of the Comarch Group companies, the following fuels have been identified: natural gas, gasoline, diesel oil, LPG, heating oil and aviation fuel.

Part of the Comarch Group's operations is also low-volume production of electronic devices from components purchased from external suppliers as well as related research and design works. Production takes place in a modern production hall located in the Special Economic Zone in Krakow.

Paper, plastic and wooden packaging and security are used in the production and logistics processes. Below there is a summary of the quantities of packaging placed on the market (their quantity results directly from the sales volume).

The following table shows the number of kilograms of packaging launched on the market by Comarch S.A. and the Comarch Group in 2021 – 2022.

Packaging launched on the market	2022	2021
Comarch S.A.	1,517 kg	762 kg
Comarch Group	2,258 kg	935 kg

8.3. Reduction of Energy Consumption

Energy Consumption of Products

Electronic devices manufactured by the Comarch Group are powered by electricity, which affects the environment. Comarch rationally manages the consumption of media, however, accurate estimation of energy consumption by these products is difficult and depends on many factors, including on the intensity of use, weather conditions, operating mode and type of accessories attached to the devices. .

The Comarch Group also provides solutions which support water, electricity and suppliers in monitoring transmission networks. The use of these solutions allows for reduced utility losses, quick fault detection, and consequently less consumption of the Earth's natural resources. Among them, it is worth mentioning Comarch Smart Metering and Comarch Smart Lighting.

Comarch Smart Metering is a solution that enables remote reading of data from water meters, and thus ensures reduction of operating costs and automation of service and maintenance of media networks. In turn, Comarch Smart Lighting is a product developed by the Comarch Group dedicated to companies and corporations. It allows the company to save between 20% and 40% of the electricity used for lighting.

E.8.2

The table below shows the percentage of revenue from finished goods and related services developed with environmental criteria in Comarch S.A. and the Comarch Group in 2021 – 2022.

Revenue from products and related services developed taking into account environmental criteria	2022	2021
Comarch S.A.	2.4%	2.4%
Comarch Group	3.3%	2.7%

Electricity, Heat, Gas and Fuel Consumption

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 activity, focusing primarily on the consumption of electricity and gas, natural gas, heating oil, LPG used in buildings owned by the Comarch Group and on the consumption of liquid fuels used to propel cars belonging to the Comarch fleet. Additionally, the consumption of water as well as liquid fuels used in power generators, low-speed equipment and machinery are

monitored. The Data Centre in Krakow, Warsaw, as well as in Dresden in Germany and in Lezennes in France have a significant share in the consumption of electricity. From 2021, monitoring also covers aviation fuel for the aircraft.

Comarch S.A.'s reporting scope includes Comarch S.A.'s own buildings, i.e., buildings in the Special Economic Zone (SSE2, SSE3, SSE4, SSE5, SSE6, SSE7), excluding the building SSE1, whose area is rented by external entities building in Łódź at Jaracza 78 Street and two buildings in Warsaw (at Puławska and Leśna Streets).

In the Comarch approach, is also taken into account consumption for buildings belonging to Comarch Group companies in Dresden, Germany, Lezennes in France,

In addition, the report also includes the buildings of MKS Cracovia at Wielicka, Siedleckiego, Kałuża and Rączna streets.

The following tables present the consumption of electricity, heat, gas and other energy carriers at Comarch S.A. and in the Comarch Group in 2020 - 2021.

Comarch S.A.'s Consumption of electricity, heat, gas and fuels	2022	2021
Consumption of energy	16,474,942 kWh	17,435,591 kWh
Consumption of heat	6,069,710 MJ	6,672,900 MJ
Consumption of natural gas	435,003 m ³	513,742 m ³
Consumption of gasoline	336,470 kg	248,459 kg
Consumption of diesel fuel	30,418 kg	29,921 kg
Consumption of aviation fuel	33,379 kg	21,473 kg
Total consumption of energy	100 845,089 MJ	103,536,400 MJ
Consumption of energy/employee	18,229 MJ/employee	19 888 MJ/employee

Electricity consumption is presented jointly for the buildings of the Special Economic Zone (SSE2, SSE3, SSE4, SSE5, SSE6, SSE7), the building in Łódź at Jaracza 78 Street and two buildings in Warsaw (at Puławska and Leśna Streets).

Electricity consumption in 2022 decreased by approx. 5.5% compared to 2021.

The consumption of heat energy is presented as the sum of energy used in the SSE5, SSE6 and SSE7 buildings and in Łódź at Jaracza 78 Stret. This value has been converted and expressed in megajoules (MJ). Heat consumption in 2022 decreased by approx. 9.0% compared to 2021.

The use of natural gas applies to the buildings of the Economic Zone (SEZ2, SSE3, SSE4) and buildings in Warsaw at Puławska and Forest Streets. The total gas consumption for these buildings was expressed in cubic meters (m3) and it was found that in 2022 this value decreased by approx. 15.3% compared to 2021.

Fuel consumption is presented for the car fleet in Poland (petrol, diesel oil), as well as for fuel used in slow-moving equipment (petrol) and in machines and aggregates used for emergency power supply (diesel oil). Fuel consumption was given in total, in kilograms, using the following coefficients for calculations: 1 liter of petrol = 0.755 kg, 1 liter of diesel = 0.84 kg, 1 liter of LPG is 0.5 kg from the Regulation of the Minister of Climate (Journal of Laws 2019 item 2443). In 2022, gasoline consumption increased by 35.4% compared to the previous year. In the case of diesel oil, it was an increase of 1.7%.

JET A-1 aviation fuel consumption is shown for the purchased aircraft. The aircraft has been in use since 2021. Aviation fuel consumption increased by 55.4% compared to 2021.

The increase in the use of fuel by the car fleet and aircraft is due to the lifting of the Covid-19 epidemic in 2022 and the related restrictions, which allowed for greater freedom of movement and holding business meetings stationary.

To calculate the total energy consumption within the organization, the consumption of electricity, heat, natural gas and fuels (gasoline, diesel oil, aviation fuel) presented above were taken into account. Fuel calorific value indices developed by KOBIZE were used to calculate the data. The total energy consumption was converted into megajoules and amounted to 100,845,089 MJ. Compared to 2021, energy consumption decreased by approx. 2.6%. The intensity of energy consumption was also calculated taking into account the number of employees in buildings owned by Comarch S.A.

According to data as at December 31, 2022, Comarch S.A. 5,532 employees were employed, which is an increase in employment by 326 people compared to the corresponding period of 2021. Energy consumption per person in 2022 amounted to 18,229 MJ, i.e. it decreased by approx. 8.3% compared to 2021.

The table below shows the consumption of electricity, heat, natural gas and other energy carriers in the Comarch Group in 2021-2022.

Consumption of electricity, heat, gas and fuels in the Comarch Group ⁸⁾	2022	2021
Consumption of energy ⁹⁾	23,594,298 kWh	24,273,157 kWh
Consumption of heat ¹⁰⁾	17,943,880 MJ	20,432,105 MJ
Consumption of natural gas ¹¹⁾	435,003 m ³	513,742 m ³
Consumption of gasoline ¹²⁾	386,640 kg	318,683 kg
Consumption of diesel oil ¹²⁾	64,025 kg	57,759 kg
Consumption of LPG ¹³⁾	98,345 kg	108,900 kg
Consumption of aviation fuel ¹⁴⁾	33,379 kg	21,473 kg
Consumption of oil fuel ¹⁵⁾	16,019 kg	17,539 kg
Total consumption of energy ¹⁶⁾	147,357,115 MJ	152,123,976 MJ
Consumption of energy/employee ¹⁷⁾	21,446 MJ/employee	22,627 MJ/employee

Summary of electricity consumption in the Comarch Group, except for buildings owned by Comarch S.A. it also features buildings in Dresden, Germany, and Lezennes, France. In addition, the buildings of MKS Cracovia at Wielicka, Siedleckiego, Kałuża and Rączna streets were also presented. In 2022, electricity consumption was lower by approx. 2.8% compared to 2021.

Data on heat energy consumption were collected for the buildings of the Special Economic Zone, the building in Łódź at Jaracza 78 Street, a building in Dresden and MKS Cracovia buildings at Wielicka, Siedleckiego and Kałuża Streets. In 2022, heat consumption decreased by approx. 12.2% compared to the previous year.

The use of natural gas was presented for three buildings of the Special Economic Zone - SSE2, SSE3, SSE4 and buildings in Warsaw at Puławska and Leśna Streets, other buildings do not have such a boiler. Consumption decreased by approx. 15.3% compared to 2021.

Consumption of fuels such as gasoline and diesel oil is presented jointly for Polish companies. This list includes fuel consumption by the car fleet, slow-moving equipment and aggregates used for emergency power supply, as

well as the machinery park of MKS Cracovia. In 2022, the consumption of gasoline and diesel oil increased compared to 2021. In the case of gasoline, consumption increased by 21.3% compared to 2021, and diesel oil by 10.8%.

The consumption of LPG includes consumption for heating the building at Rączna Street, which has been operating since 2021. Consumption decreased by approx. 9.7% compared to 2021.

Heating oil consumption is presented for the MKS Cracovia building at Wielicka Street. The oil is used for heating purposes. In 2022, there was a decrease of 8.7% compared to 2021.

The total energy consumption in 2022 amounted to 147,357,115 MJ and was 3.1% lower than the consumption in 2021. The intensity of energy consumption was also calculated taking into account the total number of people employed in the Comarch Group companies. According to the data as at December 31, 2022, the Comarch Group companies employed 6,871 employees, which is an increase in employment by 148 people compared to the corresponding period of 2021. Energy consumption per person in 2022 amounted to 21,446 MJ, i.e. it decreased by approx. 5.2% compared to 2021.

Reducing energy consumption is also conducive to responsible management of the car fleet.

In 2022, the successive replacement of the fleet in the Comarch Group companies took place with greater dynamics than in the previous year. The gradual stabilization of the automotive market (mainly after the destabilization related to the COVID-19 pandemic) resulted in greater availability of new vehicles, which allowed the Comarch Capital Group to acquire more new cars. In the Polish companies of the Comarch Group, 71 new cars meeting the EURO 6 standard were purchased (in the previous year there were 31 of them), of which 1 is a hybrid drive vehicle, while 21 vehicles meeting the EURO 4 and EURO 5 standards were withdrawn from service.

The increased dynamics of purchases made it possible to reduce the number of cars with the EURO 5 standard or lower.

The tables below present the percentage of cars in Comarch S.A. and in the Comarch Group meeting individual emission standards in 2021-2022.

Car exhaust emission standards at Comarch S.A.	2022	2021
EURO 6	86.5%	81%
EURO 5	13%	18%
EURO 4	0.5%	1%

In other companies of the Comarch Group, most cars also meet the EURO 6 emission standard. The successive replacement of the oldest models (EURO 4 and EURO 5 standards) allows us to reduce the percentage of vehicles that do not meet the EURO6 standard year after year, which can be seen in the table below.

Car exhaust emission standards at the Comarch Group	2022	2021
EURO 6	89%	87%
EURO 5	10%	12%
EURO 4	1%	1%

8.4. Water Consumption and Discharged Sewage

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

The activity of the Comarch Group companies does not involve the use of water for technological purposes. Neither surface nor underground waters are collected and no sewage is discharged into waters or soils. Water, entirely supplied by the municipal waterworks, is used in hygienic and sanitary rooms for living purposes. Significant impact on the level of water consumption in Comarch S.A. has a recreation center operating in an office complex in Krakow, which includes a 25-meter swimming pool along with a jacuzzi and a sauna. However, according to the Comarch Group, the MKS Cracovia S.S.A. sports complex has a significant impact on water consumption.

Water consumption is constantly monitored in the form of readings from sub-meters. As part of efforts to minimize consumption, employee awareness is raised, time shower faucets have been installed (swimming pool) and actions are taken to increase the speed and effectiveness of responding to various types of failures.

The following tables present water consumption in Comarch S.A. and in the Comarch Group in 2021- 2022.

Water consumption in Comarch S.A.	2022	2021
Water consumption	30,888 m ³	24,736 m ³
Water consumption per 1 employee	9.92 m ³	4.75 m ³

Water consumption in the Comarch Group	2022	2021
Water consumption	81,673 m ³	53,181 m ³
Water consumption per 1 employee	12.11 m ³	7.91 m ³

Water consumption is presented for buildings owned by Comarch in Poland, i.e., buildings located in Krakow in the Special Economic Zone (SSE2 - SSE7), and two buildings in Warsaw (at Puławska St. and at Leśna St.) and a building in Łódź at Jaracz 78 Street.

In addition, the table on water consumption in the Comarch Group presents the total water consumption taking into account buildings owned by Comarch S.A. and other Polish and foreign Group companies

In 2022, an increase in water consumption was recorded both in Comarch S.A. and as well as in the Capital Group compared to the previous year. This is due to the fact that in 2021 the vast majority of employees worked remotely, while in 2022 many employees returned to work in the office.

E.6.5

Comarch S.A. is a producer of municipal (domestic) sewage. Activities of Comarch S.A. and companies of the Comarch Group do not generate industrial sewage.

The Comarch Group 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.

8.5. Greenhouse Gas Emissions

The Amount of Greenhouse Gas Emissions

E.5.1., E.5.3.

The Comarch Group 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. Since 2022, we have been trying to act in accordance with the international standard for reporting greenhouse gas emissions - GHG Protocol Corporate Accounting and Reporting Standard, arranging the collected data in three scopes - the so-called Scope 1, Scope 2 and Scope 3. Scope 1 and 2 emissions have already been reported in previous years under the name of direct and indirect emissions. In 2022, in order to increase the transparency of the company, the reporting area was extended to include selected elements of Scope 3.

The report uses a methodology consistent with the GHG Protocol. The data obtained are expressed in the form of carbon dioxide equivalent (CO₂e). Carbon Dioxide Equivalent is a universal unit of measurement that allows estimating the global warming impact of greenhouse gas emissions such as carbon dioxide, methane, and nitrogen oxide (CO₂, CH₄, N₂O). Estimated carbon dioxide equivalent values are presented below, grouped into the mentioned ranges. Due to the change in the calculation methodology and different sources of emission factors compared to the calculations from previous years, the data from 2021 in the scope of Scope 1 and Scope 2 were recalculated and assigned to appropriate categories in accordance with the GHG standard.

The tables below present the sources of greenhouse gas emissions in Scope 1 in Comarch S.A. and in the Comarch Group in 2021-2022, expressed in carbon dioxide equivalent.

Emission source - Scope 1 at Comarch S.A.	CO ₂ equivalent [Mg CO ₂ e] in 2022	CO ₂ equivalent [Mg CO ₂ e] in 2021
Stationary combustion	881	1,041
Mobile burning	1,229	920
Leaks from air conditioners	238	98
Total CO ₂ e emissions	2,348	2,059
CO ₂ e emissions/person	0.42	0.37
CO ₂ e emissions/revenue unit*	0.0019	0.0019

*1,000 PLN

Emission source - Scope 1 in the Comarch Group	CO ₂ equivalent [Mg CO ₂ e] in 2022	CO ₂ equivalent [Mg CO ₂ e] in 2021
Stationary combustion	1,248	1,445
Mobile burning	1,485	1,221
Leaks from air conditioners	238	98
Total CO ₂ e emissions	2,972	2,763
CO ₂ e emissions/person	0.44	0.41
CO ₂ e emissions/revenue unit*	0.0016	0.0017

* 1,000 PLN

The table below presents emission sources in Scope 3 in Comarch S.A. and in the Comarch Group in the years 2021-2022, expressed in carbon dioxide equivalent.

Emission source - Scope 3	CO ₂ equivalent [Mg CO ₂ e] in Comarch S.A. in 2022	CO ₂ equivalent [Mg CO ₂ e] in the Comarch Group in 2022
Water consumption	5	12
Business travel	1,637	1,680
Waste processing	304	496
Total CO ₂ e emissions	1,946	2,188
CO ₂ e emissions/person	0.35	0.32
CO ₂ e emissions/revenue unit*	0.0016	0.0012

*1,000 PLN

The Scope 3 report on indirect emissions includes emissions from water supply, business travel and waste disposal. The year 2022 is the base year for Scope 3. In the following years, it is planned to extend reporting of

emissions from Scope 3 to include other categories. Greenhouse gas emissions for Comarch S.A. in 2022 in Scope 3 amounted to 1,945.89 Mg CO₂e, and for the Capital Group 2,188.32 Mg CO₂e.

The emission calculations used the sources of indicators developed by the GHG protocol, EPA (Environmental Protection Agency) and DEFRA (Greenhouse Gas Conversion Factor Repository). In the case of calculating emissions from purchased electricity, NEEFE (National and European Emission Factors for Electricity Consumption) indicators were used to provide a location-based value. In the Scope 3 emissions calculations, secondary emission factors EEIO (Environmentally Extended Input-Output data) were additionally used to estimate gas emissions from business trips. These values were calculated using the expenditure-based method, the so-called "spend-based method".

The tables below present the estimated sum of greenhouse gas emissions from Scope 1 and Scope 2 in Comarch S.A. and in the Comarch Group, in the years 2021 - 2022, expressed in carbon dioxide equivalent.

Greenhouse gas emissions Scope 1 and Scope 2 in Comarch S.A.	CO ₂ equivalent [Mg CO ₂ e] in 2022	CO ₂ equivalent [Mg CO ₂ e] in 2021
Total CO ₂ e emissions	14,677	15,124
CO ₂ e emissions/person	2.65	2.73
CO ₂ e emissions/revenue unit*	0.012	0.014

*1,000 PLN

Greenhouse gas emissions Scope 1 and Scope 2 in the Comarch Group	CO ₂ equivalent [Mg CO ₂ e] in 2022	CO ₂ equivalent [Mg CO ₂ e] in 2021
Total CO ₂ e emissions	19,470	20,020
CO ₂ e emissions/person	2.83	2.91
CO ₂ e emissions/revenue unit*	0.010	0.012

*1,000 PLN

The tables below present the estimated total greenhouse gas emissions from all three scopes - Scope 1, Scope 2, Scope 3 in Comarch S.A. and in the Comarch Group in 2022, expressed in carbon dioxide equivalent.

Total greenhouse gas emissions Scope 1, Scope 2 and Scope 3 in Comarch S.A.	CO ₂ equivalent [Mg CO ₂ e] in 2022
Mg CO ₂ e emission	16,623
Mg CO ₂ e emissions/person	3.00
Mg CO ₂ e emissions/revenue unit*	0.014

*1,000 PLN

Total greenhouse gas emissions Scope 1, Scope 2 and Scope 3 in the Comarch Group	CO ₂ equivalent [Mg CO ₂ e] in 2022
Mg CO ₂ e emission	21,659
Mg CO ₂ e emissions/person	3.21
Mg CO ₂ e emissions/revenue unit*	0.012

*1,000 PLN

Within Scope 1 and Scope 2, a decrease in carbon dioxide equivalent emissions is observed compared to 2021 - in the case of Comarch S.A. by 2.95%, and in the case of the Capital Group by 2.75%. Total greenhouse gas emissions from all three ranges for Comarch S.A. in 2022 amounted to 16,623.25 Mg CO₂e, and for the Capital

Group 21,658.63 Mg CO₂e. The intensity of greenhouse gas emissions was also calculated, taking into account the number of employees.

In Comarch S.A. according to data as at December 31, 2022, 5,532 people were employed, and in the Capital Group 6,871 people, which is an increase in employment by 326 and 148 people, respectively compared to the same period in 2021. Total greenhouse gas emissions per person in 2022 amounted to 3.00 Mg CO₂e (for Comarch S.A.) and 3.21 Mg CO₂e (for the Capital Group).

The Comarch Group, taking care of both the environment and the reduction of costs related to transport, shortens the supply chain to the maximum by applying the principle of delivery directly from the distribution point to the end user or business partner, wherever possible, i.e., where no intervention is required to configure, install on the equipment or such interference would still occur at the end user's location.

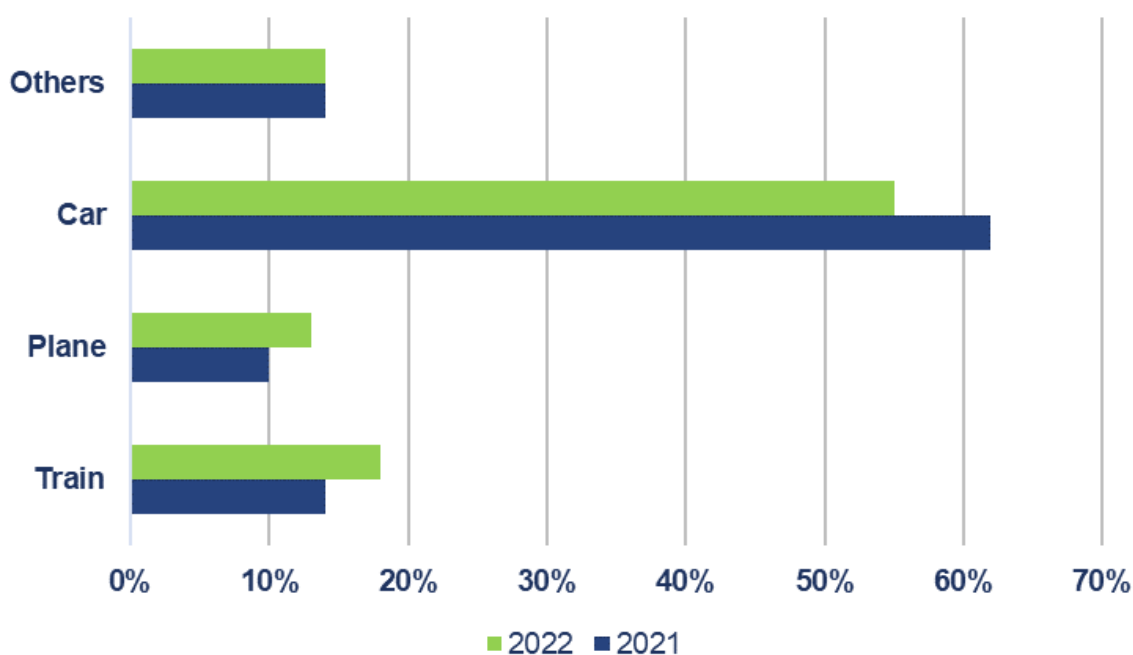
A large reduction in the impact of transporting goods and products is also possible thanks to the use of public transport - courier companies.

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

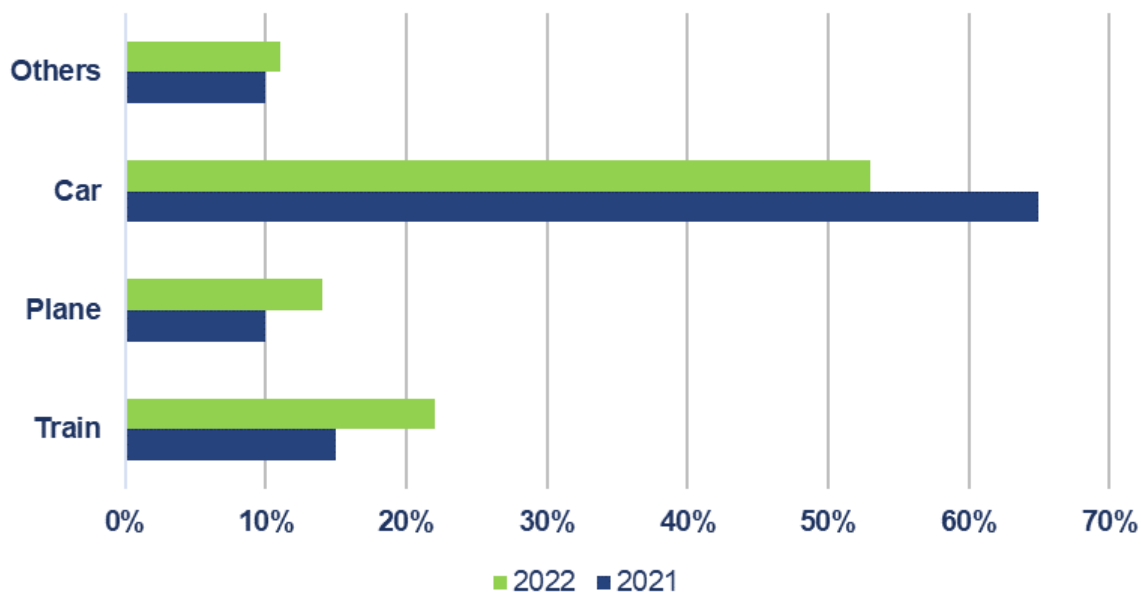
Because Comarch has a very large group of recipients, which are medium and large enterprises from around the world, the number of business trips carried out by Comarch employees is counted in thousands.

In 2022, the number of delegations in the Comarch Group increased by approx. 73% compared to 2021, but it was still much lower compared to 2019. The car was still the most popular means of transport, but its use in relation to other means of transport decreased from approx. 62% in 2021 to approx. 55% in 2022. The share of rail and airplane use increased by approx. 30% compared to 2021 and amounted to 22% and 19%, respectively, for the Comarch Group. The charts below show the use of means of transport during domestic and foreign delegations in Comarch S.A. and in the Comarch Group in 2021 - 2021.

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



Reduction of Greenhouse Gas Emissions

Actions related to the reduction of greenhouse gas emissions carried out in 2022:

- Systematic maintenance and modernization and leak checks of installations containing hydrofluorocarbons (HFCs),
- Production of renewable energy in our own photovoltaic installation,
- Ongoing implementation of energy-saving solutions (replacement of light sources with LED lighting),
- Gradual replacement of combustion vehicles with ones that meet the latest emission standards, increasing employee awareness by promoting ecological values among employees.

E.5.2., E.5.4.

In the opinion of the Comarch Group, the Comarch Group companies do not have a direct or significant impact on climate change.

The tables below present greenhouse gas emissions - carbon dioxide, methane, nitrogen oxide (I) (CO₂, CH₄, N₂O) in Scope 1 and Scope 2 converted to carbon dioxide equivalent in Comarch S.A. and in the Comarch Group in 2021-2022.

Comarch S.A.	2022	2021
CO ₂ Mg CO ₂ e emission	2,484	2,372
CO ₂ Mg CO ₂ e emissions/revenue unit *	0.0021	0.0022
CH ₄ Mg CO ₂ e emission	1.43	1.65
CH ₄ Mg CO ₂ e emissions/revenue unit *	1.18*10 ⁻⁶	1.55*10 ⁻⁶
N ₂ O Mg CO ₂ e emission	5.22	5.62
N ₂ O Mg CO ₂ e emissions/revenue unit *	4.31*10 ⁻⁶	5.26*10 ⁻⁶

*1 000 PLN

Grupa Comarch	2022	2021
CO ₂ Mg CO ₂ e emission	3,852	3,941

CO ₂ Mg CO ₂ e emissions/revenue unit *	0.0021	0.0024
CH ₄ Mg CO ₂ e emission	2.13	2.44
CH ₄ Mg CO ₂ e emissions/revenue unit *	1.15*10 ⁻⁶	1.50*10 ⁻⁶
N ₂ O Mg CO ₂ e emission	13.71	14.95
N ₂ O Mg CO ₂ e emissions/revenue unit *	7.38*10 ⁻⁶	9.19*10 ⁻⁶

The tables below present the total emissions of greenhouse gases - carbon dioxide, methane, nitrogen oxide (I) (CO₂, CH₄, N₂O) in Scope 1, Scope 2 and Scope 3 converted to carbon dioxide equivalent in Comarch S.A. and in the Comarch Group in 2021-2022.

Comarch S.A.	2022
CO ₂ Mg CO ₂ e emission	4,072
CO ₂ Mg CO ₂ e emissions/revenue unit *	0.0034
CH ₄ Mg CO ₂ e emission	3.41
CH ₄ Mg CO ₂ e emissions/revenue unit *	2.82*10 ⁻⁶
N ₂ O Mg CO ₂ e emission	5.22
N ₂ O Mg CO ₂ e emissions/revenue unit *	4.31*10 ⁻⁶

*1,000 PLN

Grupa Comarch	2022
CO ₂ Mg CO ₂ e emission	5,480
CO ₂ Mg CO ₂ e emissions/revenue unit *	0.0029
CH ₄ Mg CO ₂ e emission	4.17
CH ₄ Mg CO ₂ e emissions/revenue unit *	2.24*10 ⁻⁶
N ₂ O Mg CO ₂ e emission	13.71
N ₂ O Mg CO ₂ e emissions/revenue unit *	7.38*10 ⁻⁶

*1,000 PLN

In the reporting year 2022, a decrease in the emission of most greenhouse gases is observed in terms of Comarch S.A. and the Comarch Group. Increase in carbon dioxide emissions in Comarch S.A. may have resulted from increased fuel consumption in the fleet, caused by the lifting of restrictions related to the end of the Covid-19 epidemic in 2022. Pursuant to the Act of 17 July 2009 on the management system of greenhouse gas emissions and other substances, emissions of greenhouse gases and other substances for 2022 were reported in the National Base on Emissions of Greenhouse Gases and Other Substances (KOBiZE), where information is collected on emission sources, together with the location of the sources and operating parameters of individual installations ("Report for places where the environment is used" and "Report on the operation of equipment"). In addition, in accordance with the Act of April 27, 2001 Environmental Protection Law, a "List containing information and data on the scope of use of the environment and the amount of fees due" was prepared, on the basis of which fees for the use of the environment were paid (in the case of Comarch Capital Group companies, only introduction of gases and dust into the air) to the account of the competent Marshal's Office.

8.6. Waste

E.6.5

The Comarch Group produces waste generated as a result of the day-to-day operations. The largest part is electrical and electronic equipment, which is amortized and replaced. Before classifying the equipment as waste, it is assessed in terms of the possibility of its further use within the Group or by external entities.

Products manufactured by the Comarch Group do not have a significant negative impact on the natural environment during use. The degree of environmental impact of introduced electronic products at the end of their life cycle depends mainly on the behaviour of customers in this regard. The Comarch Group collects used electronic and electrical equipment.

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

The Comarch Group has implemented waste management procedures. Waste is collected selectively and prevents its negative impact on the natural environment. In the field of waste transport and disposal, the Comarch Group cooperates only with authorized entities that have technical means and administrative decisions that allow for the management of the transferred waste in a manner that is safe for people and the environment.

The table below shows the amount of waste generated and transferred by the Comarch Group companies in 2021 - 2022. The largest percentage share in the stream of waste generated by the Comarch Group is used electrical and electronic equipment, resulting from the withdrawal from use and replacement of IT equipment (waste code 16 02 14). This waste, in accordance with the applicable legal requirements, undergoes the process of recycling and recovery in waste treatment installations of external companies.

iMed24 Medical Center, which is a part of Comarch Healthcare S.A., is a producer of medical waste (waste code 18 01 03 and 18 01 09) resulting from medical activities. These wastes are transported and neutralized by authorized entities.

The table below shows the weight of waste in megagrams (Mg) (1 Mg = 1 ton) in total for all Polish companies of the Comarch Capital Group. Quantitatively significant types of waste are marked in bold.

Type of waste	Code of waste	The amount of waste generated and transferred in 2022 (locations in Poland)	The amount of waste generated and transferred in 2021 (locations in Poland)
Foundry dross and slag	10 10 03	-- Mg	0.0210 Mg
Mixed packaging waste	15 01 06	0.8800 Mg	0.4800 Mg
Packaging containing residues of or contaminated by hazardous substances	15 01 10*	0.0250 Mg	0.0130 Mg
Sorbents, filter materials (including oil filters not included in other groups), wiping cloths (e.g., rags, cloths) and protective clothing contaminated with hazardous substances (e.g., PCB)	15 02 02*	0.0080 Mg	0.0105 Mg
Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12	16 02 13*	0.8470 Mg	0.3650 Mg

Discarded appliances other than those mentioned in 16 02 09 to 16 02 13	16 02 14	11.3330 Mg	13.7640 Mg
Spent inorganic chemicals containing hazardous substances (e.g. expired chemical reagents)	16 05 07*	0.0200 Mg	-- Mg
Discarded organic chemicals containing hazardous substances (e.g., out-of-date chemicals)	16 05 08*	0.0850 Mg	0.0625 Mg
Other batteries and accumulators	16 06 05	0.4450 Mg	0.0500 Mg
Mixed construction waste; repairs and dismantling other than those mentioned in 17 09 01; 17 09 02 and 17 09 03	17 09 04	2.5600 Mg	-- Mg
Medical waste (Comarch Healthcare S.A. iMed24 Medical Center	18 01 03*	6.5640 Mg	6.5390 Mg
Medical waste (Comarch Healthcare S.A., iMed24 Medical Center)	18 01 09	0.0050 Mg	0.0140 Mg

* hazardous waste

Data on waste generated by the companies of the Comarch Group can be found in the Database on Products, Packaging and Waste Management (BDO), which is available at: www.bdo.mos.gov.pl. All companies of the Comarch Group conducting activities that result in the generation of waste have been registered with the BDO and have an individual registration number, assigned by the competent marshal of the voivodeship. All registration obligations in the field of waste (waste transfer cards and waste registration cards) and reporting obligations in the field of waste management, which are imposed on the companies of the Comarch Group, are carried out only in electronic form, via BDO.

Recovery and recycling

The companies of the Comarch Group operate in the field of the Act on waste electrical and electronic equipment, on batteries and accumulators, as well as on the management of packaging and packaging waste.

In 2022, the obligations related to recovery and recycling resulting from the Act on waste electrical and electronic equipment (incumbent on Comarch S.A., CA Consulting S.A., Comarch Polska S.A., Comarch Healthcare S.A. and Comarch Technologies Sp. z o.o.) were carried out by Biosystem Elektrorecycling Organization of Electrical and Electronic Equipment Recovery S.A. on the basis of the concluded contract, which transfers the liability for these obligations from the entrepreneur to the Organization.

On the other hand, obligations related to recovery and recycling resulting from the Act on batteries and accumulators (incumbent on Comarch S.A., Comarch Healthcare S.A. and Comarch Technologies Sp. z o.o.), as well as obligations related to recovery and recycling resulting from the Act on the packaging management and packaging waste (for Comarch S.A.) was carried out by Biosystem Organizacja Odzysku Opakowań S.A.

Companies that did not have signed relevant agreements with recovery organizations in the implementation of obligations under the Act on batteries and accumulators and the Act on the management of packaging and packaging waste, did not achieve the required levels of collection, recovery and recycling, therefore the fees paid for 2022 product fees for these companies.

All reporting obligations in the field of the Act on waste electrical and electronic equipment, on batteries and accumulators, as well as on the management of packaging and packaging waste, which are borne by Comarch Group companies, are carried out only in electronic form, via the Product and Packaging Database and on waste management (BDO), which is available at: www.bdo.mos.gov.pl.

Currently, the Comarch Group's facilities contain e-waste containers, in which employees can leave used electrical and electronic equipment, as well as used batteries and accumulators on a regular basis.

8.7. The Degree of Compliance with Regulations

E.7.3., E.7.4.

The Comarch Group has implemented a procedure for identifying and accessing legal requirements. It monitors changes in legal regulations, recommendations and guidelines of scientific/research units in the field of health and safety, work ergonomics, environmental protection and fire protection on an ongoing basis, and then takes action to implement these changes. At least once a year, an assessment of compliance with applicable legal requirements and other requirements adopted by the Comarch Group is carried out. The results of the assessment are presented in the documentation prepared as part of the review of the Integrated Management System, and then presented to the Management Board. In the reporting period, no financial penalties and non-financial sanctions have been imposed on Comarch S.A. and the Comarch Group companies for non-compliance with environmental protection regulations.

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

E.7.1., E.7.2.

The operational activity of the Comarch Group does not result in the emission of pollutants other than those described in the report into the environment. .

E.7.2.

ODS and F-gas emissions are monitored in Poland by the Central Register of Operators (CRO), which is a register of devices (including refrigeration, air conditioning) and fire protection systems containing at least 3 kg of controlled substances or 5 tons CO₂ equivalent (CO₂ eq) of fluorinated greenhouse gases - also known as F-gases. The register was created on the basis of the provisions of the Act of May 15, 2015 on substances that deplete the ozone layer and on certain fluorinated greenhouse gases (Journal of Laws of 2015, item 881, as amended). It is conducted in electronic form (at: cro.ichp.pl) by a specialized unit, which is the Łukasiewicz Research Network - Industrial Chemistry Research Institute. Prof. Ignacy Mościcki in Warsaw. Data in the CRO database collected in the electronic form of the Device Card or Fire Protection System Card, which contains information about the operator and the amount and type of substances or fluorinated greenhouse gas contained in the device or system. The card also includes a list of activities related to installation, maintenance, servicing, leakage control and decommissioning of the device or system.

In 2022, there was emission of F-gases (fluorinated greenhouse gases) from leaks in refrigeration and air conditioning systems. In each of the cases, the cause of the leak was located in order to remove it, and the missing amount of the refrigerant in the device was supplemented. All uncontrolled leaks were recorded in the CRO database in the cards of individual devices.

The table below presents the total emissions of ODS and F-gases in the Comarch Group in the years 2021 - 2022.

ODS and F-gas emissions	2022	2021
The Comarch Group	120.00 kg	54.30 kg

The data in the table above show emissions monitored on the basis of the CRO database for devices (including air conditioning and refrigeration) and fire protection systems owned by the Comarch Group.

8.8. Activities for the Environment and Investments Related to Environmental Protection

Responsible Administration of Comarch Group Buildings - Energy Management, Photovoltaics, Rainwater and Waste Segregation

The Comarch Group facilities are modern buildings with electricity and heat management systems. There are six office buildings on the campus of in Krakow, which employ over 3,500 people on a daily basis. The company has its own buildings and rents over a dozen offices in Poland and abroad. Management of these properties is carried out taking into account pro-ecological practices, such as environmental and health and safety inspections, modernization of buildings and equipment, the use of renewable energy sources or the application of an appropriate purchasing policy. In facilities in the Special Economic Zone in Kraków, Warsaw and Łódź, lamps are gradually replaced with new ones with LED technology as well as more modern and energy-saving devices are introduced. These activities are aimed at improving energy efficiency and result from the implemented energy management system. Selective waste collection is carried out in all buildings.



Since 2018, Comarch S.A. has the BREEM Very Good certificate issued for the SSE7 building, located in the Special Economic Zone in Krakow, within the campus at prof. Michał Życzkowski Street in Krakow. The certificate confirms that the building has been designed with care for ecology and a friendly working environment. Additionally, due to concern for the natural environment, photovoltaic cells were installed on the roof of the building. These devices are capable of producing over 40,000 kWh of electricity, which covers up to 20% of the building's energy consumption.



Additionally, all Comarch Group buildings are equipped with modern ventilation systems with heat recovery. In two office buildings on the Krakow campus and in the facility in Łódź, systems that collect rainwater are



installed. On the SSE7 building there is a rainwater collection tank with a capacity of 8 m³ and on the SSE6 building with a capacity of 150 m³. This water is used to care for green areas on the company's premises, using an irrigation system.

We Are Building an Ecological Car Fleet

In 2022, over 85% of cars met stringent emission standards, and only 1% of vehicles are cars below the EURO 5 standard. The percentage of cars with ecological drives in the entire structure of the Comarch Group fleet is also constantly increasing - currently there are 23 such

vehicles.

Employees Are Eco Too!

Comarch promotes ecological values among its employees by implementing activities that encourage conscious use of natural resources and reduce energy consumption. In utility rooms and common spaces there are messages reminding you to turn off the lights, computers and other devices after finishing work, use reusable envelopes in internal correspondence, limit printing and sending correspondence by e-mail and prudent use of running water.

Additionally, in the break rooms in the Comarch Group buildings, water dispensers or devices that filter the water are installed. In this way, the company encourages employees to switch from bottled water to tap water.

Comarch employees also took part in the "Re(create) it together" competition, which consisted in collecting used and unnecessary electronic equipment at selected points of the branch in Krakow, and then transferring it to Waste Electrical Equipment Processing Plant and Electronic Equipment Biosystem S.A. This equipment has been processed in accordance with the highest environmental protection standards, and previously carefully weighed, on the basis of which the appropriate amount was donated to the selected foundation.

Pro-Ecological Goals

Each year, goals and actions are set to reduce negative environmental impacts and raise employee awareness as part of environmental, energy and health and safety programs. The most important goals for taking active measures to reduce environmental pollution set in 2022 were to maintain the principles of selective waste collection and to take actions to increase employee awareness in the field of environmental protection and recycling. There are also goals to improve energy efficiency, which indirectly reduces the negative impact on the environment. The objectives included the continuation of the modernization of lighting in buildings and the comprehensive modernization of lighting (replacement with energy-saving LED sources), and the continuation of the fleet modernization process. The goal was also to increase the share of renewable electricity by installing a photovoltaic installation at other facilities in the SEZ in Krakow and also in the building at Puławska Street in Warsaw. Summary of the implementation of designated activities is part of the review under the Integrated Management System.

Investments Related to Environmental Protection

The Comarch Group constantly modernizes air-conditioning devices to make them more environmentally friendly, at the same time adjusting their operation settings so that energy consumption is most efficient. There are plans to test modernize the air handling unit by replacing ordinary motors with invector fans. They are designed to reduce electricity consumption and increase efficiency, the by-product will be to reduce the noise of the AHU operation. In addition, the temperatures in the work rooms are constantly analyzed and optimized without losing comfort for employees, but at the same time reducing the consumption of thermal energy. In addition, fluorescent luminaires are successively replaced with light sources created in LED technology and more modern and energy-saving devices (EnergyStar) are installed.

In 2022, plans were implemented to replace communication and fire lighting with ecological LED lighting in the SSE3 and SSE5 buildings in Kraków and in the buildings at Puławska and Leśna Streets in Warsaw, which will reduce the energy demand by approx. 173 MWh per year. As a result of the implementation of these investments and the pre-certification audit, Comarch became the holder of white certificates worth 14,891 toe.

In 2022, the communication and fire protection lighting in the SSE3 and SSE5 buildings, together with the recreation complex and the iMed24 clinic, were modernized, thanks to which energy consumption will decrease by 131,930 kWh per year. In addition, motion sensors and time switches were installed on the buildings, allowing for additional optimization of energy consumption. The lighting in the car park was also replaced with modern LEDs, thanks to which we improved visibility, thus reducing electricity consumption by 9995 kWh per year. In 2022, Comarch continued investments in renewable energy sources. In 2022, two installations with a capacity of 50 kWp each were created in the SSE6 building, according to the plan, and further expansion will take place in the following years, including in the building in Warsaw on Puławska Street. The energy produced in this way is used to partially cover the company's own demand for electricity and, if necessary, to resell the excess energy produced to the power grid.



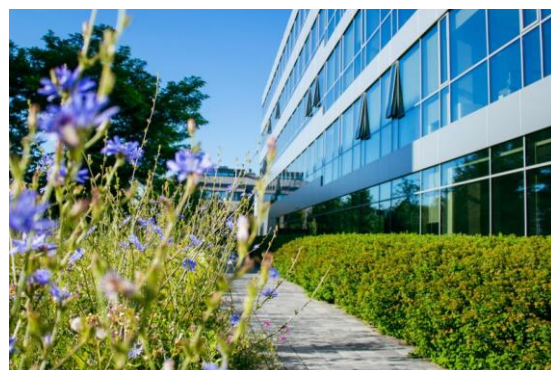
Obtaining Energy from RES (Renewable Energy Sources)

The table below shows the value of energy produced by own photovoltaic installations in the years 2021 - 2022.

Energy produced	2022	2021
Amount of produced energy in [kWh]	184,200	39,684

Parallel to the investment in renewable energy, expenditure was made to install additional 6 electric car charging stations with a capacity of up to 11kW, which are then made available to Comarch employees free of charge. Thanks to the investments described above, Comarch has become a prosumer of electricity.

As part of reducing the impact on the natural environment, 1,000 m² of green areas near the building complex in the Special Economic Zone in Krakow have been converted into a flower meadow, which improves water retention, creates excellent conditions for bees and birds, and additionally increases the aesthetic value of the surroundings throughout the summer season.



As part of reducing exhaust emissions and noise, loud petrol lawn mowers have been replaced with electric stand-alone robots that take care of the largest lawns in the Special Economic Zone in Krakow, mowing and fertilizing them at the same time.

The table below presents additional expenses for environmental protection related to the costs of meeting the obligations of collecting, recovering and recycling introduced electronic equipment, packaging, batteries and waste management at Comarch S.A. and in other Polish companies of the Comarch Group in 2021-2022.

Expenditure on environmental protection in the field of waste disposal, recycling and recovery of introduced products (in thousands of PLN)	2022	2021
Comarch S.A.	13	13
Other companies of the Comarch Group	53	53

All of the above activities undertaken by Comarch contribute to the achievement of the objectives set out in the ESG strategy in the environmental area.

8.9. EU Taxonomy

Taxonomy is the informal name of the provisions of European Union law that defines the criteria for recognizing an activity as environmentally sustainable. The taxonomy was adopted by Regulation (EU) 2020/852 of the European Parliament and of the Council of 18th of June, 2020 on the establishment of a framework to facilitate sustainable investment, which requires disclosure of whether and to what extent the activity of a given enterprise is consistent with the assumptions of the EU Taxonomy.

The purpose of introducing new regulations is to develop and implement tools to support making informed investment decisions, and consequently, to redirect capital from investments to those more conducive to sustainable development. In addition, the introduction of harmonized pan-European rules will allow to eliminate the phenomenon of the so-called „greenwashing”.

The European Commission has issued a number of implementing acts to the EU Taxonomy Regulation, i.e. .:

- EU Commission Delegated Regulation 2021/2139 of 4 June 2021 establishing **technical screening criteria** for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives ("Delegated Act Establishing Technical Screening Criteria").
- Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, supplementing Regulation (EU) 2020/852 by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation ("EU Taxonomy: The Article 8 Delegated Act").

According to the EU Taxonomy, Comarch S.A. for the first time in the 2021 report, it presented key performance indicators:

- percentage of turnover,
- percentage of capital expenditure (CapEx),
- percentage of operating expenses (OpEx),

qualifying for the EU Taxonomy, without testing their compliance with the Technical Screening Criteria. Key performance indicators have been prepared both at the individual level for Comarch S.A. and at the consolidated level for the Capital Group.

The eligibility assessment was carried out against the first two objectives set out in Annexes I and II of the *Delegated Act Establishing Technical Screening Criteria*:

- climate change mitigation,
- climate change adaptation.

In the disclosures for 2022, Comarch S.A. presents activities that qualify for the taxonomy of the EU and activities in accordance with the Technical Qualification Criteria. After analyzing the qualification of its activity to the taxonomy of the EU and conducting a study of compliance with the Technical Qualification Criteria, Comarch S.A. calculated the key efficiencies, i.e. the percentage share of turnover, CapEx and Opex qualifying for the EU Taxonomy and compliant with the Technical Qualification Criteria. Key performance indicators have been prepared both at the individual level for Comarch S.A. and at the consolidated level for the Capital Group.

An activity that qualifies for the EU Taxonomy and complies with the Technical Eligibility Criteria is an environmentally sustainable activity. Environmentally sustainable operations can be considered if the following three conditions are met jointly (applies to disclosures for 2022):

- contributes substantially to one or more of the two environmental objectives:
 - climate change mitigation,
 - climate change adaptation.
- does not significant harm to other environmental objectives (DNSH);;
- is carrying out an economic activity to ensure the alignment with the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation.

Identification of Activities Carried out by the Companies of the Comarch Group Through the Prism of Taxonomy

The process of identifying activities qualifying for the EU Taxonomy began with a review of all activities carried out by the companies of the Comarch Group in relation to the first two environmental goals indicated in the EU Taxonomy in order to determine which of them can significantly contribute to climate change mitigation or adaptation to climate change, on the basis of the description contained in the Delegated Act establishing the Technical Screening Criteria. The activities were identified in three areas: generated sales revenues, incurred investment expenditures and incurred operating expenses. The following persons were involved in the process of identifying activities eligible for the EU taxonomy and assessment of their compliance with the Technical Qualification Criteria: managerial staff, business area experts, controlling, people responsible for the ESG area and external experts.

At the individual and consolidated level, Comarch S.A. as a significant activity that qualifies for the EU Taxonomy, identified the activity "8.1. Data processing, website management (hosting) and similar activities", which consists of revenues obtained from the provision of services in the cloud model, i.e.: Software as a service (SaaS), Platform as a service (PaaS) and Infrastructure as a service (IaaS).

Verification of compliance with the Technical Qualification Criteria

Comarch S.A. verified compliance with the Technical Qualification Criteria for activities eligible for the taxonomy, i.e. "8.1. Data processing, website management (hosting) and similar activities", on an individual and consolidated level. The verification carried out showed a lack of compliance of the above-mentioned activities with certain Technical Qualification Criteria, i.e.: failure to verify by an independent third party the implementation of the recommended practices listed in the European Code of Conduct on the Energy Efficiency

of Data Centers, as well as failure to meet the Global Warming Potential criterion of refrigerants used in air conditioning systems in data centers. The vast majority of refrigerants used have coefficients exceeding the limits indicated in the EU Taxonomy. Comarch will take steps to meet the Technical Qualification Criteria in the coming years.

Verification of compliance with Minimum Guarantees

Verification of compliance with the Minimum Guarantees set out in Art. 18 of Regulation 2020/852 of June 18, 2020, was carried out at Comarch S.A. and the Comarch Group in accordance with the recommendations included in the Final Report on Minimum Safeguards by Platform On Sustainable Finance. Comarch S.A. and companies of the Comarch Group meet the requirements of Minimum Guarantees, i.e. they have and use due diligence solutions that are to ensure conducting business in accordance with the principles and recommendations in such documents as the OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises and the UN Guidelines on Business and human rights, including the principles and rights set out in the eight core conventions identified in the International Labor Organization Declaration on Fundamental Principles and Rights at Work and the principles and rights set out in the International Charter of Human Rights.

In Comarch S.A. and in the Comarch Group implemented, among others:

- The Code of Conduct applicable in the Comarch Group companies is available at: <https://www.comarch.pl/o-firmie/zrownowazony-biznes/kodeks-etyczny/>, in which Comarch, among others, undertakes to:
 - compliance with international human rights standards and international labor standards,
 - compliance with the principles of fair competition, prevention of bribery, illegal payments and corruption.
- Sustainable Development Policy for Suppliers, which defines the most important principles that the company follows when implementing cooperation with business partners. In addition, this document is a commitment to a sustainable procurement policy and defines expectations for key suppliers, including in respect of human rights.
- Anti-Corruption Policy, implemented in the Comarch Group, which is a set of applicable rules and standards of conduct aimed at preventing and responding to activities that may bear signs of corruption.
- Procedures for analyzing and evaluating suppliers and subcontractors.
- Whistleblowing system enabling anonymous reporting with the possibility of anonymous two-way communication with the person reporting the violation.

In relation to Comarch S.A. and companies of the Comarch Group, there have been no final convictions in the area of human rights, corruption, fair competition and taxation.

The database of notifications of the OECD NCP and the Business and Human Rights Resources Center (BHRRRC) was verified, which showed that there were no notifications in relation to the Comarch Group companies in the period covered by the verification.

Nuclear energy and natural gas activities

Both Comarch S.A. and the Comarch Group companies do not conduct activities related to nuclear energy and natural gas within the meaning of the Delegated Act to Art. 8 of the EU taxonomy, therefore this report does not present the compliance of the above-mentioned listed activities with the taxonomy set out in the Delegated Act establishing the Technical Qualification Criteria.

The Accounting Policies

KPIs have been calculated in accordance with the EU Taxonomy: The Article 8 Delegated Act, taking into account proprietary processes, existing reporting systems and assumptions made. In the process of determining the indicators, the significance criterion was used, therefore the values that were not significant in 2022 from the point of view of the amount of revenue, capital expenditure or operating expenses, were not included in the indicators.

In order to calculate the percentage of turnover, CapEx and Opex eligible for and compliant with the EU Taxonomy, the following rules were applied:

Turnover

In order to determine the efficiency ratio in the form of a percentage of Comarch S.A.'s turnover and the Comarch Group qualifying for the EU Taxonomy, and compatible with it, the following rules were adopted:

- the percentage of turnover eligible for the EU Taxonomy, and compatible with it, was calculated by dividing
 - sums of revenues identified as qualifying for the EU Taxonomy, and compatible with it - (all revenues refer to contracts with customers) by, respectively,
 - revenues of Comarch S.A. disclosed in the profit and loss account in the financial statements of Comarch S.A. for the period 01.01.2022-31.12.2022 or,
 - consolidated revenues of the Comarch Group disclosed in the consolidated profit and loss account in the consolidated financial statements of the Comarch Group for the period from 01/01/2022 to 31/12/2022.

The activity "8.1. Data processing, website management (hosting) and similar activities", which consists of revenues obtained from the provision of services in the cloud model, i.e.: Software as a service (SaaS), Platform as a service (PaaS) and Infrastructure as a service (IaaS). The percentage of revenues related to qualified activities in 2022 for Comarch S.A. is 18%, and for the Comarch Group 14%. This activity was found to be incompatible with the taxonomy of the EU due to the lack of meeting the Technical Qualification Criteria for this activity.

Capital expenditures (CapEX)

In order to determine the result indicator in the form of a percentage of capital expenditure (CapEx), Comarch S.A. and the Comarch Group qualifying for the EU Taxonomy, and compatible with it, the following rules were adopted:

- The percentage of capital expenditure (CapEx) eligible for the EU Taxonomy, and compatible with it, was calculated by dividing
 - sums of investment outlays identified as eligible for the systematics of the EU Taxonomy, and compatible with it, by respectively,
 - the sum of investment expenditure included in the financial statements of Comarch S.A. for the period from 01/01/2022 to 31/12/2022, calculated according to the definition of the EU Taxonomy, according to which the sum of investments includes an increase in:
 - *intangible assets (acquisition of intangible assets under Note 1b Changes in intangible assets),*
 - *fixed assets (increases in fixed assets in Note 2b Changes in fixed assets),*
 - *investment property (increases in Note 3a Change in property) or*
 - the sum of investment expenditures included in the consolidated financial statements of the Comarch Group for the period from 01/01/2022 to 31/12/2022, calculated according to the definition of the EU Taxonomy, according to which the sum of investments includes the increase:
 - *intangible assets (purchase of intangible assets in Note 3.7. Other intangible assets),*
 - *fixed assets (increases in fixed assets in Note 3.3 Property, plant and equipment),*
 - *right-of-use assets (increases in Note 3.4 Right-of-use asset),*
 - *investment property (see Note 3.5 Investment property).*

Investments related to the activity "8.1. Data processing, website management (hosting) and similar activities", concerning the development of the technical infrastructure of data centers. The percentage of investment outlays related to qualified activities in 2022 for Comarch S.A. is 12%, and for the Comarch Group 40%. The high ratio for the Comarch Group is related to the construction of a modern server room where Comarch will provide

its services to customers from the USA and other countries of North and South America. These investments were found to be inconsistent with the taxonomy of the EU due to the failure to meet the Technical Qualification Criteria for the activity "8.1. Data processing, website management (hosting) and similar activities.

Comarch S.A. in 2022, it expanded photovoltaic installations for a total amount of PLN 780,000 PLN. Investment in renewable energy sources contributes to the reduction of Comarch's impact on the environment, however, these expenditures have not been included in this indicator due to the lack of direct connection with Comarch's business activity, which qualifies for the EU Taxonomy. More information on renewable energy sources can be found in section 8.8. of this report.

Operational expenses (OpEX)

In order to establish the performance indicator in the form of operational expenditure (OpEx) eligible for the EU Taxonomy, and compatible with it, the following principles were adopted:

- the percentage of operational expenditure (OpEx) eligible for the EU Taxonomy, and compatible with it, is calculated by dividing,
 - the sum of operational expenditure identified as eligible for the EU Taxonomy, and compatible with it, by
 - the sum of all direct, non-capitalized costs related to:
 - research and development works,
 - refurbishment and renovation of buildings,
 - short-term leasing / rental,
 - maintenance, servicing and repair,other direct expenses related to the day-to-day servicing of property, plant and equipment, necessary for the continuous and effective operation of the assets.

Expenditures related to the activity "8.1. Data processing, website management (hosting) and similar activities", concerning the maintenance of data center infrastructure in good technical condition. The percentage of operating expenses related to qualified activities in 2022 for Comarch S.A. is and the Comarch Group 2%. The largest share in operating expenses related to the maintenance of tangible fixed assets concerns Comarch's office infrastructure, not directly related to Comarch's operations, which qualifies for the EU Taxonomy. These expenses were found to be inconsistent with the taxonomy of the EU due to the failure to meet the Technical Qualification Criteria for the activity "8.1. Data processing, website management (hosting) and similar activities.

Other information

The data used for the calculations come from the financial and accounting systems of individual subsidiaries of the Comarch Group.

The Group avoided double counting when allocating turnover and capital expenditures by making appropriate consolidation exclusions in accordance with applicable accounting regulations.

Comarch S.A. - Percentage of turnover for products or services related to the business activity in accordance with the taxonomy

Economic activities (1)	Code(s) (2)	Absolute turnover (3) [tys. PLN]	Proportion of turnover (4) [%]	Substantial contribution criteria						DNSH criteria (Do No Significant Harm')						Taxonomy- aligned proportion of turnover, year 2021 (19) [%]	Taxonomy- aligned proportion of turnover, year 2022 (18) [%]	Category enabling activity (20) [E]	Category transitional activity (21) [T]
				Climate change mitigation (5) [%]	Climate change adaptation (6) [%]	Water and marine resources (7) [%]	Circular economy (8) [%]	Pollution (9) [%]	Biodiversity and ecosystems (10) [%]	Climate change mitigation (11) [T/N]	Climate change adaptation (12) [T/N]	Water and marine (13) [T/N]	Circular economy (14) [T/N]	Pollution (15) [T/N]	Biodiversity and ecosystems (16) [T/N]				
A. ELIGIBLE ACTIVITIES																			
A.1. Types of environmentally sustainable activities (in accordance with the taxonomy)																			
Turnover from environmentally sustainable activities (taxonomy compliant) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
A.2 Activities that qualify for the taxonomy but are not environmentally sustainable (non-taxonomy activities)																			
8.1 Data processing website management (hosting) and similar activities	63.11.Z	216,565	18%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	T
Turnover from activities qualifying for the taxonomy but not environmentally sustainable (non-taxonomy activities) (A.2)		216,565	18%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total (A.1 + A.2)		216,565	18%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
B. NON-ELIGIBLE ACTIVITIES																			
Turnover of non-eligible activities (B)		994,061	82%																
Total (A + B)		1,210,626	100%																

Comarch Group - Percentage share of turnover for products or services related to business activity in accordance with the taxonomy

Economic activities (1)	Code(s) (2)	Absolute turnover (3) [tys. PLN]	Proportion of turnover (4) [%]	Substantial contribution criteria						DNSH criteria (Do No Significant Harm')						Minimum safeguards (17) [T/N]	Biodiversity and ecosystems (16) [T/N]	Pollution (15) [T/N]	Circular economy (14) [T/N]	Water and marine (13) [T/N]	Climate change adaptation (12) [T/N]	Climate change mitigation (11) [T/N]	Biodiversity and ecosystems (10) [%]	Pollution (9) [%]	Circular economy (8) [%]	Water and marine resources (7) [%]	Climate change adaptation (6) [%]	Climate change mitigation (5) [%]	Category enabling activity (20) [E]	Taxonomy-aligned proportion of turnover, Year 2021 (19) [%]	Taxonomy-aligned proportion of turnover, Year 2022 (18) [%]	Category transitional activity (21) [T]	
				Water and marine resources (7) [%]	Climate change adaptation (6) [%]	Climate change mitigation (5) [%]	Water and marine resources (7) [%]	Climate change adaptation (6) [%]	Climate change mitigation (5) [%]	Biodiversity and ecosystems (10) [%]	Pollution (9) [%]	Circular economy (8) [%]	Water and marine resources (7) [%]	Climate change adaptation (6) [%]	Climate change mitigation (5) [%]																		Biodiversity and ecosystems (16) [T/N]
A. ELIGIBLE ACTIVITIES																																	
A.1. Types of environmentally sustainable activities (in accordance with the taxonomy)																																	
Turnover from environmentally sustainable activities (taxonomy compliant) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
A.2 Activities that qualify for the taxonomy but are not environmentally sustainable (non-taxonomy activities)																																	
8.1 Data processing website management (hosting) and similar activities	63.11.Z	264,618	14%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	T
Turnover from activities qualifying for the taxonomy but not environmentally sustainable (non-taxonomy activities) (A.2)		264,618	14%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total (A.1 + A.2)		264,618	14%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
B. NON-ELIGIBLE ACTIVITIES																																	
Turnover of non-eligible activities (B)		1,594,097	86%																														
Total (A + B)		1,858,715	100%																														

Comarch S.A. - Percentage share of capital expenditures for products or services related to economic activity in accordance with the taxonomy

Economic activities (1)	Code(s) (2)	Absolute turnover (3) [tys. PLN]	Proportion of turnover (4) [%]	Substantial contribution criteria						DNSH criteria (Do No Significant Harm')							Category transitional activity (21) [T]	Category enabling activity (20) [E]	Taxonomy - aligned proportion of turnover, year 2021 (19) [%]	Taxonomy - aligned proportion of turnover, year 2022 (18) [%]
				Climate change mitigation (5) [%]	Climate change adaptation (6) [%]	Water and marine resources (7) [%]	Circular economy (8) [%]	Pollution (9) [%]	Biodiversity and ecosystems (10) [%]	Climate change mitigation (11) [T/N]	Climate change adaptation (12) [T/N]	Water and marine (13) [T/N]	Circular economy (14) [T/N]	Pollution (15) [T/N]	Biodiversity and ecosystems (16) [T/N]	Minimum safeguards (17) [T/N]				
A. ELIGIBLE ACTIVITIES																				
A.1. Types of environmentally sustainable activities (in accordance with the taxonomy)																				
Turnover from environmentally sustainable activities (taxonomy compliant) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
A.2 Activities that qualify for the taxonomy but are not environmentally sustainable (non-taxonomy activities)																				
8.1 Data processing website management (hosting) and similar activities	63.11.Z	9,224	12%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	T
Turnover from activities qualifying for the taxonomy but not environmentally sustainable (non-taxonomy activities) (A.2)		9,224	12%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total (A.1 + A.2)		9,224	12%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
B. NON-ELIGIBLE ACTIVITIES																				
Turnover of non-eligible activities (B)		70,028	88%																	
Total (A + B)		79,252	100%																	

Comarch Group - Percentage share of investment outlays for products or services related to business activity
in accordance with the taxonomy

Economic activities (1)	Code(s) (2)	Absolute turnover (3) [tys. PLN]	Proportion of turnover (4) [%]	Substantial contribution criteria						DNSH criteria (Do No Significant Harm')											
				Climate change mitigation (5) [%]	Climate change adaptation (6) [%]	Water and marine resources (7) [%]	Circular economy (8) [%]	Pollution (9) [%]	Biodiversity and ecosystems (10) [%]	Climate change mitigation (11) [T/N]	Climate change adaptation (12) [T/N]	Water and marine (13) [T/N]	Circular economy (14) [T/N]	Pollution (15) [T/N]	Biodiversity and ecosystems (16) [T/N]	Minimum safeguards (17) [T/N]	Taxonomy-aligned proportion of turnover, year 2022 (18) [%]	Taxonomy-aligned proportion of turnover, year 2021 (19) [%]	Category enabling activity (20) [E]	Category transitional activity (21) [T]	
A. ELIGIBLE ACTIVITIES																					
A.1. Types of environmentally sustainable activities (in accordance with the taxonomy)																					
Turnover from environmentally sustainable activities (taxonomy compliant) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
A.2 Activities that qualify for the taxonomy but are not environmentally sustainable (non-taxonomy activities)																					
8.1 Data processing website management (hosting) and similar activities	63.11.Z	92,580	40%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	T
Turnover from activities qualifying for the taxonomy but not environmentally sustainable (non-taxonomy activities) (A.2)		92,580	40%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total (A.1 + A.2)		92,580	40%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
B. NON-ELIGIBLE ACTIVITIES																					
Turnover of non-eligible activities (B)		137,704	60%																		
Total (A + B)		230,284	100%																		

Comarch S.A. - Percentage of operating expenses for products or services related to the economic activity in accordance with the taxonomy

Economic activities (1)	Code(s) (2)	Absolute turnover (3) [tys. PLN]	Proportion of turnover (4) [%]	Substantial contribution criteria						DNSH criteria (Do No Significant Harm')						Minimum safeguards (17) [T/N]	Biodiversity and ecosystems (16) [T/N]	Pollution (15) [T/N]	Circular economy (14) [T/N]	Water and marine (13) [T/N]	Climate change adaptation (12) [T/N]	Climate change mitigation (11) [T/N]	Biodiversity and ecosystems (10) [%]	Pollution (9) [%]	Circular economy (8) [%]	Water and marine resources (7) [%]	Climate change adaptation (6) [%]	Climate change mitigation (5) [%]	Category enabling activity (20) [E]	Taxonomy-aligned proportion of turnover, year 2021 (19) [%]	Taxonomy-aligned proportion of turnover, year 2022 (18) [%]	Category transitional activity (21) [T]
				Climate change mitigation (5) [%]	Climate change adaptation (6) [%]	Water and marine resources (7) [%]	Circular economy (8) [%]	Pollution (9) [%]	Biodiversity and ecosystems (10) [%]	Climate change mitigation (11) [T/N]	Climate change adaptation (12) [T/N]	Water and marine (13) [T/N]	Circular economy (14) [T/N]	Pollution (15) [T/N]	Biodiversity and ecosystems (16) [T/N]																	
A. ELIGIBLE ACTIVITIES																																
A.1. Types of environmentally sustainable activities (in accordance with the taxonomy)																																
Turnover from environmentally sustainable activities (taxonomy compliant) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
A.2 Activities that qualify for the taxonomy but are not environmentally sustainable (non-taxonomy activities)																																
8.1 Data processing website management (hosting) and similar activities	63.11.Z	644	2%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	T	
Turnover from activities qualifying for the taxonomy but not environmentally sustainable (non-taxonomy activities) (A.2)		644	2%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Total (A.1 + A.2)		644	2%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
B. NON-ELIGIBLE ACTIVITIES																																
Turnover of non-eligible activities (B)		39,097	98%																													
Total (A + B)		39,741	100%																													

**Comarch Group - Percentage share of operating expenses for products or services related to business activity
in accordance with the taxonomy**

Economic activities (1)	Code(s) (2)	Absolute turnover (3) [tys. PLN]	Proportion of turnover (4) [%]	Substantial contribution criteria						DNSH criteria (Do No Significant Harm')											
				Climate change mitigation (5) [%]	Climate change adaptation (6) [%]	Water and marine resources (7) [%]	Circular economy (8) [%]	Pollution (9) [%]	Biodiversity and ecosystems (10) [%]	Climate change mitigation (11) [T/N]	Climate change adaptation (12) [T/N]	Water and marine (13) [T/N]	Circular economy (14) [T/N]	Pollution (15) [T/N]	Biodiversity and ecosystems (16) [T/N]	Minimum safeguards (17) [T/N]	Taxonomy-aligned proportion of turnover, year 2022 (18) [%]	Taxonomy-aligned proportion of turnover, year 2021 (19) [%]	Category enabling activity (20) [E]	Category transitional activity (21) [T]	
A. ELIGIBLE ACTIVITIES																					
A.1. Types of environmentally sustainable activities (in accordance with the taxonomy)																					
Turnover from environmentally sustainable activities (taxonomy compliant) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
A.2 Activities that qualify for the taxonomy but are not environmentally sustainable (non-taxonomy activities)																					
8.1 Data processing website management (hosting) and similar activities	63.11.Z	1,014	2%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	T
Turnover from activities qualifying for the taxonomy but not environmentally sustainable (non-taxonomy activities) (A.2)		1,014	2%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total (A.1 + A.2)		1,014	2%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
B. NON-ELIGIBLE ACTIVITIES																					
Turnover of non-eligible activities (B)		60,717	98%																		
Total (A + B)		61,731	100%																		

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 SIN	
Managerial	Description of the business model and strategic development directions	High/medium/ low	G.1.1., G.1.2.	
	Governance	High/medium/ low	G.2.1., G.2.2., G.2.3.	
	Social and environmental risk management	High/medium/ low	G.3.1., G.3.2.	
	Ethics management	High/ medium /low	G.4.1., G.4.2., G.4.3., G.4.4., G.4.5., G.4.6., G.4.7., G.4.8.	
Environmental	Direct and indirect impact: raw materials and materials	High/ medium /low	E.1.1., E.1.2.	
	Direct and indirect impact: fuel and energy	High/ medium /low	E.2.1., E.2.2., E.2.3.	
	Direct and indirect impact: water	High/ medium /low	E.3.1., E.3.2., E.3.3.	
	Direct and indirect impact: biodiversity	High/medium/ low	E.4.1., E.4.2., E.4.3., E.4.4.	
	Direct and indirect impacts: emissions to the atmosphere	High/ medium /low	E.5.1., E.5.2., E.5.3., E.5.4.	
	Direct and indirect impact: waste and sewage	High/ medium /low	E.6.1., E.6.2., E.6.3., E.6.4., E.6.5.	
	Other aspects of direct and indirect environmental impact	High/ medium /low	E.7.1., E.7.2., E.7.3., E.7.4., E.7.5., E.7.6.	
	Extended environmental responsibility: products and services	High/ medium /low	E.8.1., E.8.2., E.8.3.	
	Social and employee	Use of public aid and public orders	High/medium/ low	S.1.1., S.1.2.
		Employment level and remuneration level	High/ medium /low	S.2.1., S.2.2., S.2.3., S.2.4., S.2.5., S.2.6., S.2.7., S.2.8., S.2.9., S.2.10., S.2.11., S.2.12., S.2.13., S.2.14., S.2.15.
Relations with the employee side and freedom of association		High/ medium /low	S.3.1., S.3.2., S.3.3., S.3.4., S.3.5., S.3.6.	
Occupational Health and Safety		High /medium/low	S.4.1., S.4.2., S.4.3., S.4.4., S.4.5., S.4.6., S.4.7., S.4.8., S.4.9., S.4.10., S.4.11., S.4.12.	
Development and education		High/ medium /low	S.5.1., S.5.2.	
Diversity management		High/ medium /low	S.6.1., S.6.2., S.6.3., S.6.4.	
Human rights		High /medium/low	S.7.1., S.7.2., S.7.3., S.7.4., S.7.5., S.7.6.	
Child labour and forced labour		High/ medium /low	S.8.1., S.8.2., S.8.3., S.8.4.	
Local communities and social involvement		High/ medium /low	S.9.1., S.9.2., S.9.3., S.9.4., S.9.5., S.9.6.	
Counteracting corruption		High/ medium /low	S.10.1., S.10.2., S.10.3.	
Safety of products and consumers		High/ medium /low	S.11.1., S.11.2., S.11.3.	

Child Labour	High/medium/ low	S.12.1., S.12.2., S.12.3.
Privacy protection	High /medium/low	S.13.1., S.13.2., S.13.3.
Product labelling	High/ medium /low	S.14.1., S.14.2., S.14.3.
Other social and market issues	High/ medium /low	S.15.1., S.15.2., S.15.3., S.15.4., S.15.5., S.15.6.

10. Overview of SIN (Non-financial Reporting Standards)

SIN indicator	Disclosures	Placement in the Report (page number)
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Comarch S.A.

Av Jana Pawła II 39a
31-864 Krakow

ir@comarch.pl

+48 12 687 78 22

[comarch.pl/relacje-inwestorskie/](https://www.comarch.com/investors/) (ENG: <https://www.comarch.com/investors/>)