

COMARCH



Comarch S.A. and Comarch Group Consolidated Non- Financial Data Statement for 2021

Kraków, 29th of April, 2022

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+/- 100 countries on **6** continents
– we carry out projects all over the world



PLN 1,627 million
of sales revenue



PLN 123 million
of net profit attributable to shareholders



61
companies in the Comarch Group



11.5%
net margin



6,700+
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 and promoting pro-ecological attitudes among the crew. The Group constantly supports various initiatives of local communities and significantly increased the scale of charitable activities.

The past two years year has proved that the Comarch Group was very well prepared to operate also in crisis conditions caused by the Covid-19 pandemic. We are convinced that the Comarch Group due to the very good financial situation, significant product, industry and geographical diversification of its offer and the commitment of employees, will be able to strengthen its market position as a global provider of IT solutions in the coming periods, to the satisfaction of customers, employees, shareholders and the whole social and economic environment.

The year 2022 brought another challenge in the form of Russia's aggression against Ukraine. The Comarch Group is in full solidarity with the Ukrainian nation and on the first day of the conflict it started an organized campaign to support the arrival to Poland and ensure the stay of its employees from Ukraine with their families. Several dozen people were provided with aid, mainly women and children, and at the same time, the aid is addressed to all citizens of Ukraine. Support is provided, inter alia, by direct financing of supplies of materials needed in Ukraine, use of the car fleet to organize transport, provision of business apartments, medical care at the iMed24 Medical Center, Comarch recreational infrastructure and assistance in organizing a stay in Poland. The Comarch Group actively employs Ukrainian citizens and makes every effort to ensure the continuity of IT services in Ukraine.

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 for the first time 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 2021 and comparative data for 2020. 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.

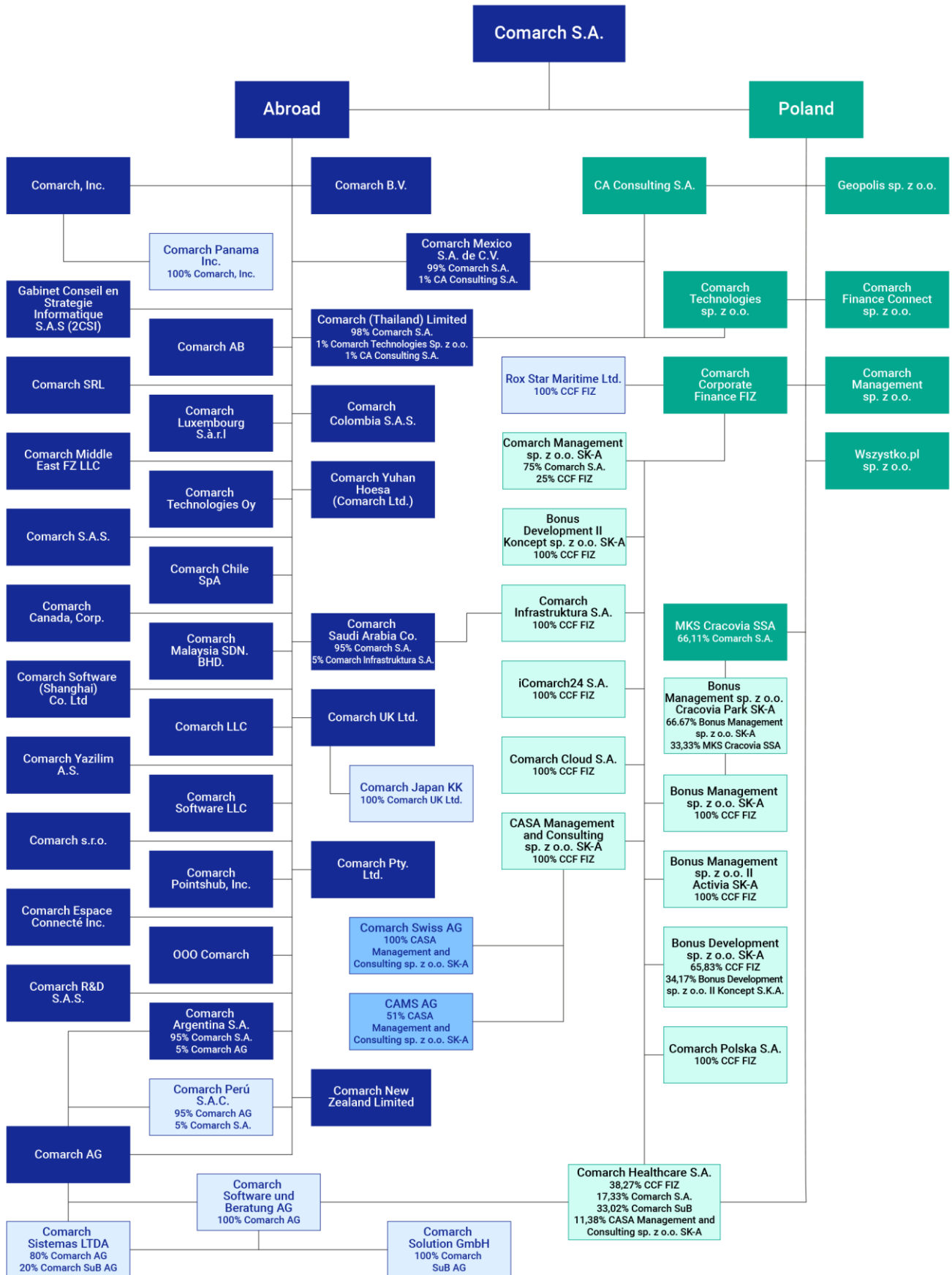
2. Information about Comarch Capital Group

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 2020 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.



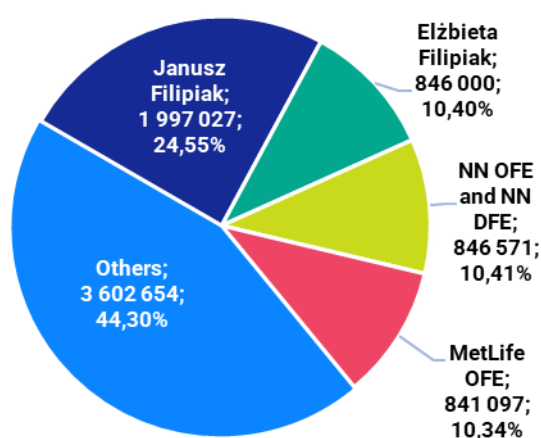
100% Comarch S.A., unless otherwise indicated.

Shareholders and Activities of the Company

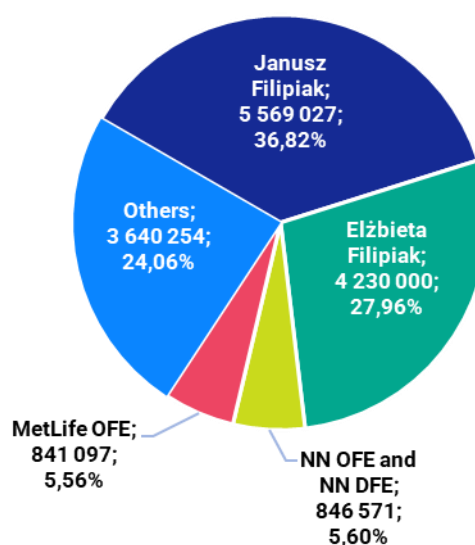
The basic activities of the Comarch Group, in which Comarch S.A. with its registered office in Krakow at Al. Jana Pawła II 39 A is a Parent Company, include activity related to software, PKD 62.01.Z. The registration court for Comarch S.A. is the District Court for Krakow Śródmieście in Krakow, The Eleventh 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 29th of April, 2022.

Shareholding - number of shares



Shareholding - number of votes



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 launched 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 20 branches in Poland and 1 in Albania, the Comarch Group consists of 61 companies located on 5 continents, in 36 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, the Comarch Group established new subsidiary - Rox Star Maritime Ltd. with its headquarters in Malta.

For 2022, 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 2021.

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

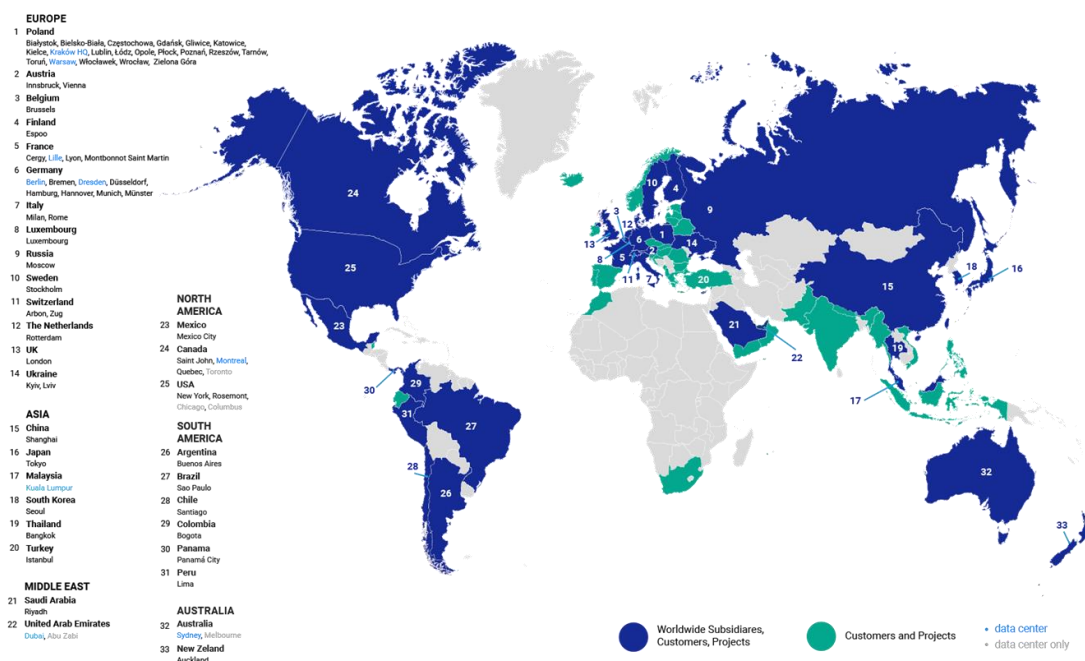
59
Companies

91
Offices

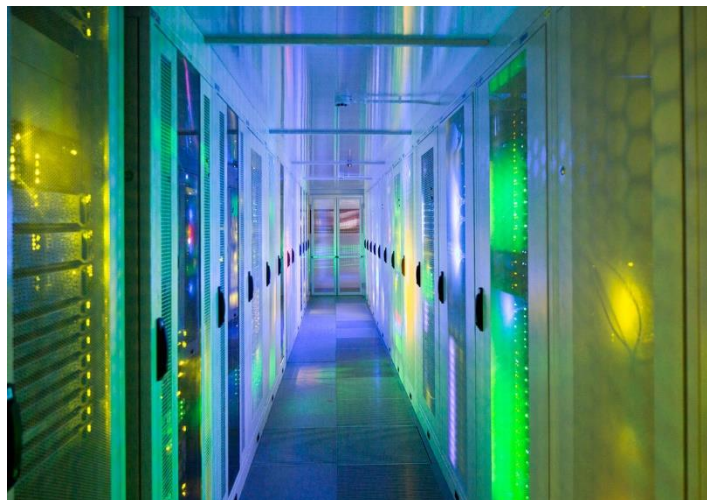
In
70
cities

In
33
countries

On
5
continents



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



Comarch stores data in 14 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 for the end of 2022.

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 2021 reached PLN 317,1 million and thus exceeded 19.5% of Comarch Group's sales revenues. The Comarch Group allocated both own resources to them and actively acquired European funds. These funds are actively acquired by two Comarch Group companies - Comarch S.A. and Comarch Healthcare S.A. Expenses for research and development in Comarch S.A. in 2021 reached PLN 278,7 million, which accounts for 26.1% 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 3.12 of the Consolidated Financial Statements of the Comarch Group for 2021.

S.1.2. The table below presents sales to customers from the public sector in 2020 – 2021.

in thousands of PLN	2021	%	2020	%
Revenue Comarch S.A.	1,067,448	100.0%	999,401	100.0%
<i>including public sector</i>	14,836	1.4%	23,858	2.4%
Revenue Comarch Group	1,627,149	100.0%	1,536,753	100.0%
<i>including public sector</i>	133,821	8.2%	154,541	10.1%

In 2021, the Comarch S.A.'s revenue from sales to the public sector clients decreased by 37.8%, i.e., by PLN 9,022 thousand, compared to 2020. Regarding Comarch Group's revenue from sales to public sector, they increased by 13.4%, i.e., PLN 20,720 thousand. The public sector was responsible for 8.2% 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 2020 – 2021.

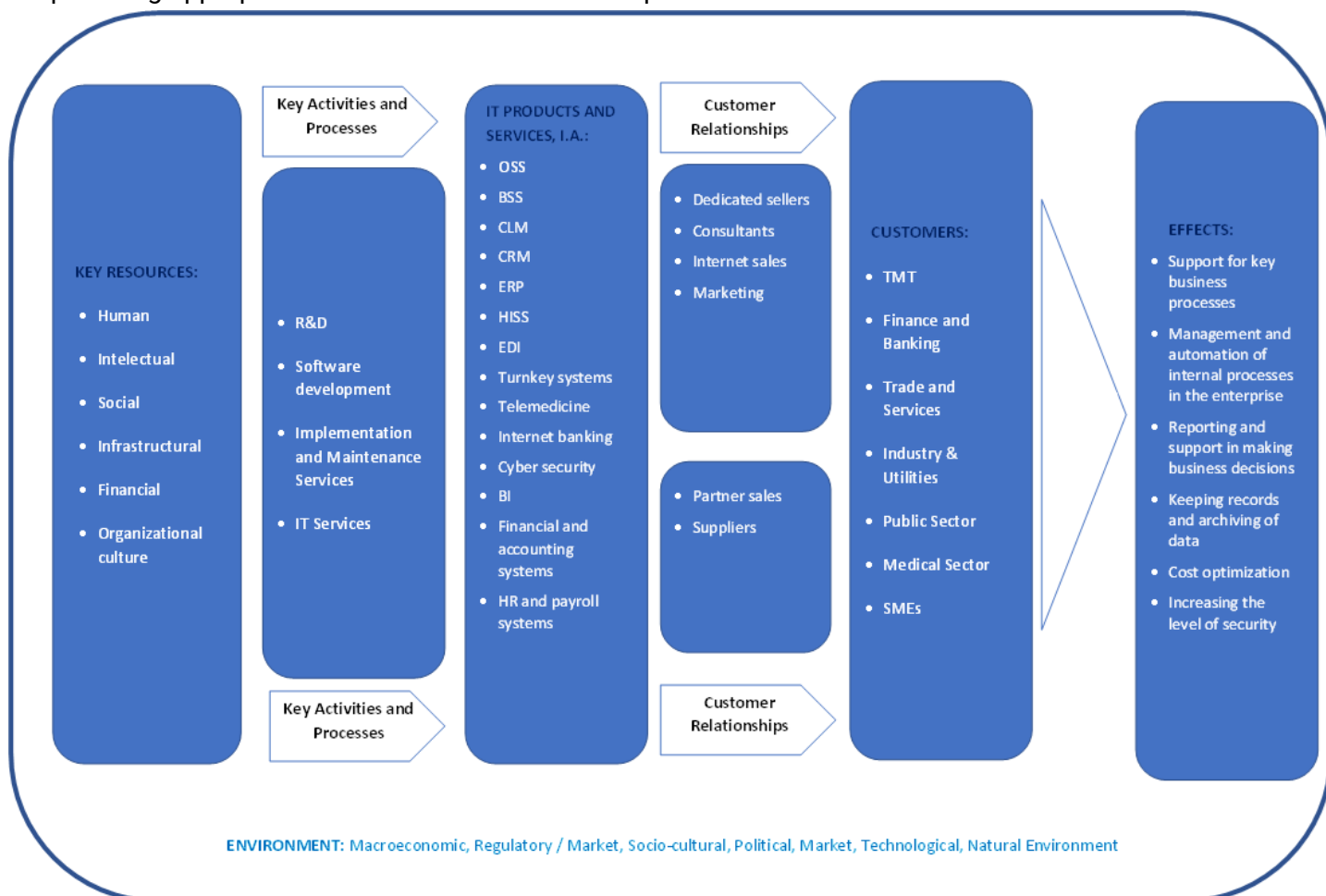
in thousands of PLN	2021	2020
Comarch S.A.		
7 Framework Program (European Commission)	-	-
Structural Funds POIG (Operational Program Innovative Economy)	-	-
Structural Funds POIR (Operational Program Innovative Development)	329	859
National funds	-	-
De minimis aid	144	147
Total	473	1,006
Comarch Group		
7 Framework Program (European Commission)	-	-
Structural Funds POIG (Operational Program Innovative Economy)	-	-
Structural Funds POIR (Operational Program Innovative Development)	329	859
National funds	-	-
De minimis aid	543	304
Regional Operational Programme of Łódzkie Voivodeship	-	(361)
Lesser Poland Regional Operational Programme (Structural Funds)	207	-
Anti-crisis politic COVID-19	125	541
Total	1,204	1,343

2.3. Organizational Culture and Business Model

For nearly 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.



2.4. 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, 2021, Comarch S. A. employed 5,206 persons compared to 5,006 persons employed as at 31st of December, 2020, while in the entire Capital Group the number of employees increased to 6,723 persons compared to 6,462 persons as at 31st of December, 2020.

The tables below present the average number of people employed at Comarch S.A. and in the Comarch Group in 2017 – 2021.

Average number of employees in Comarch S.A.	2021	2020	2019	2018	2017
Employment agreement	4,327	4,117	4,057	3,753	3,492
Other form of employment	887	925	930	934	844
Total	5,214	5,042	4,987	4,687	4,336

As at 31st of December, 2021, in the Group 3,090 employees were employed in Krakow, 2,116 in other cities in Poland.

Average number of employees in Comarch Group	2021	2020	2019	2018	2017
Employment agreement	5,427	5,119	5,087	4,727	4,393
Other form of employment	1,360	1,383	1,361	1,364	1,245
Total	6,787	6,502	6,448	6,091	5,638

As at 31st of December, 2021 in Comarch Group 3,720 employees were employed in Krakow, 2,387 in other cities in Poland and 616 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 2020 – 2021.

Electricity, heat, gas and water consumption and overall CO ₂ e emissions of Comarch S.A.	2021	2020
Electricity consumption	16,046,906 kWh	17,364,894 kWh
Heat consumption	4,510,190 MJ	4,037,720 MJ
Gas consumption	513,742 m ³	465,673 m ³
Water consumption	20,802 m ³	24,655 m ³
Overall emission of CO ₂ e	13,216 Mg CO ₂ e	14,347 Mg CO ₂ e

Electricity, heat, gas and water consumption and overall CO ₂ e emissions of Comarch Group	2021	2020
Electricity consumption	24,273,157 kWh	24,560,075 kWh
Heat consumption	20,431,759 MJ	17,545,681 MJ
Gas consumption	513,742 m ³	465,673 m ³
Water consumption	53,181 m ³	66,013 m ³
Overall emission of CO ₂ e	18,150 Mg CO ₂ e	18,291 Mg CO ₂ e

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

2.5. 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. The TeleManagement Forum (TMF) is a non-profit organization that was founded in 1988 to accelerate the development of telecommunications network management systems. ETIS, on the other hand, is an international organization which aim is to support members in increasing their business efficiency by exchanging information on the effective use of computer technologies. In turn, the PIKOM cluster gathers small and large research laboratories and training institutions dealing with a specific industry branch.

In 2019, Comarch joined MEF - an industry association associating 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 Italy, Comarch 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 Comarch is also a member of the Osservatorio Innovazione Digitale in Sanità. The mission of the institution is to create and disseminate knowledge about the impact that digital technologies have on enterprises, public administration and citizens. Moreover, it belongs to the Polish Chamber of Business in Italy CAPI.

In the Benelux countries, Comarch belongs to the Belgian-Polish-Luxembourg Chamber of Commerce, whose mission is to promote Belgian and Luxembourg investments and exports to Poland, and to support 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 between the business community in the Auvergne-Rhône-Alpes region and the logistics sector associated with it. Comarch also belongs to the Adira organization, which brings together all regional IT players. In addition, 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, which 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.

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, whose goal is to enable and encourage dialogue between industry leaders. In addition, he is also a member of The Polish Australian Business Forum, a non-for-profit organization that creates a networking platform for Polish professionals living in Australia.

2.6. Awards and Rankings in 2021

- Report „**Computerworld TOP200**” – Comarch S.A. took the first place in the following categories:
 - service provider in the cloud model,
 - provider of IT solutions and services for the telecommunications sector
 - provider of RPA systems and business process automation,
 - IT company with the largest expenditure on R&D.
- The competition of the monthly "**IT in Administration**" - Comarch e-Office system won the second place in the Plebiscite of the Product of the Year "IT in Administration" in the category: Software dedicated to public administration.
- The Board of Advisors of "**The Asian Banker**" magazine - a project carried out by Comarch for TMB Thanachart regarding the implementation of the Comarch Corporate Banking (CCB) system launched under the TTB Business ONE brand was awarded the title of the Best Digital Transformation Implementation in Thailand.
- **Pipeline Innovation Awards** - Comarch took second place in five categories: Innovation in Business Support Systems, Innovation in Operational Support System, Innovation in Artificial Intelligence (AI), Innovation in Assurance and Innovation in Pandemic Response.
- **Japan-Central Europe Investment Summit & Awards** - Comarch won the Top CEE Digital Services Provider to Japan award.
- **Editors of the economic portal WNP.PL and Nowy Przemysł** - Comarch magazine received a distinction in the category of "Polish investor abroad".
- **The "Hit of the Year 2021" competition organized by Gazeta Bankowa** - the jury awarded recommendations to Comarch RPA for KYC and Comarch AI-based Product Ranking systems. ♣ Polityka's CSR leaves - Comarch has won the White Leaf.
- **TM Forum Catalyst** - Comarch, together with the project "AIOps Autonomous Service Assurance", was awarded the Catalyst Award 2020 for outstanding contribution to TM Forum assets.
- Congress of **Hewlett Packard Enterprise's partners** - Comarch won the first prize in the category "The highest turnover in the as-a-service model".

Comarch in analytical companies reports

- Once again, Comarch was included among the representative suppliers of OSS solutions in the Gartner report. Gartner's "**Market Guide for CSP Operations Support System Solutions**" describes areas such as: market definition, key findings regarding the state of the OSS strategy among both CSP vendors and OSS product vendors, and defines recommendations for the organization CIOs responsible for the OSS strategy and her transformation.
- Comarch was included in **Gartner's 2021 "Market Guide for CSP Revenue Management and Monetization Solutions" list**.
- Comarch was included in the group of 50 leaders in the fintech industry and named the "rising star" of 2021 in the industry **report The Center for Financial Professionals (CeFPro)**.
- According to the report "**Poland Enterprise Application Software Market Analysis and 2020 Vendor Shares**", prepared by the analytical company IDC, the share of Comarch in the market of IT solutions for enterprise management in Poland is 21.5 percent. This result gives Comarch the position of the largest Polish supplier of ERP systems on the domestic market and the second place in the ranking of

manufacturers, taking into account both Polish and foreign companies. In addition, Comarch is the only manufacturer from the top three whose market shares increased compared to the previous year, with the simultaneous decline of the other two companies.

- Comarch was included in the **"Now Tech: Loyalty Marketing, Q4 2020"** report by Forrester, one of the world's leading market research companies, which shares insights and advice with customers and the public on the current and potential impact of technology.
- Comarch was included in the report on loyalty solutions prepared by Forrester **"The Forrester Wave™: Loyalty Solutions, Q2 2021"**.

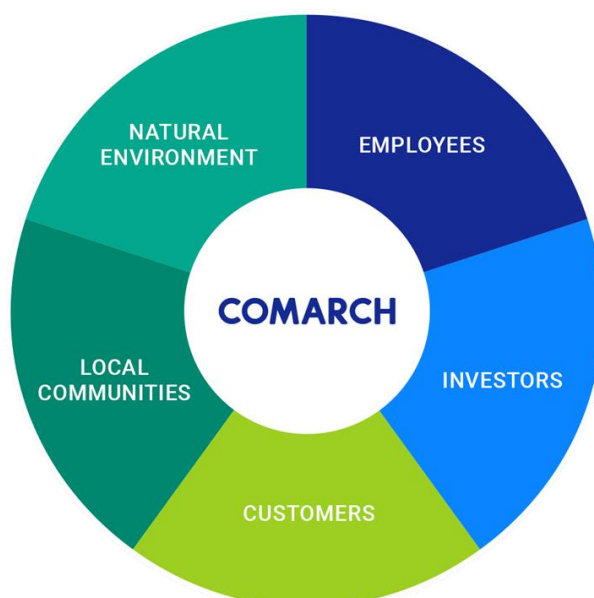
3. Stakeholder Engagement

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 on which Comarch ERP customers help each other 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.

At the beginning of 2022, the Community also got a new section: Marketplace. It is a place where add-ons created by Comarch Certified Partners for Comarch ERP systems are presented.

On the main page of the platform, www.Spolecznosci.Comarch.pl, you can follow the current statistics, which at the end of February 2022 are as follows:

- 13,098 questions asked,
- 35,202 answers,
- 14,070 comments,
- 2,907 ideas for new functionalities and improvement of existing ones, over 300 of which have been implemented by Comarch.

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 has been implemented and certified in Comarch S.A., while the implemented procedures are in force 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 added to the structure of Comarch S.A. 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 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 Export Control System Policy has been implemented within the Comarch Capital Group, whose main document is the Export 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 2021 was 113. 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 2021, 26 non-compliances, 149 strengths and 80 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 has been certified by the Polish Centre for Testing and Certification (PCTC) since 2008 as part of the Integrated Management System. The system covers all internal processes supporting the company's activity and business processes and covers all of the company's assets.

The Security Policy regulations include organizational issues, raising of employee awareness, physical asset protection, IT technical security, business continuity and response to incidents of information security breaches. Internal policies and procedures have been defined to regulate the confidentiality, integrity and availability of Comarch and 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 improvements and corrective actions are taken.

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

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

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

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

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.

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.

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

In 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.

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

- Directive 93/42/EEC Medical devices (MDD),
- Regulation of the European Parliament and of the Council (EU) 2017/745 (MDR),
- EN-ISO 13485 Medical Devices standard. Quality Management Systems. Requirements for the purposes of legal provisions,
- ISO 9001 standards, Quality management systems - Requirements.

G.3.2.

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, there is also a possibility to report the medical incidents, i.e., irregularities regarding a medical device that may or may have led to the death or serious deterioration of the health of the patient or user of the device. A register of such cases is kept in Comarch S.A. and Comarch Healthcare S.A. Since the beginning of the activity, no medical incidents have been identified in the field of medical devices.

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 received certificate confirming that the Quality Management System meets the requirements of 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 scope of activity of the iMed24 Medical Centre related to the provision of medical services carries specific risks. Risks within the system are identified at the company-wide level. Within the system identified:

- 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.

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 Information Security Management Systems. 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. in the above-mentioned location. 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.

4.2. 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 contained in the Code and update its content on the basis of received applications.

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. According to the kept register, in 2021, on the above-mentioned address, no infringements of the Code were received. 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.

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 2021, on a question in the survey: *Does your company have implemented the Code of Conduct?* „YES” was answered by all the companies, which sent back the questionnaires. Suppliers who answered “YES” to this question in 2020 accounted for 69% of respondents.

4.3. 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 2020 - 2021.

Comarch S.A.	2021	2020
number of people participating in training	857	655
total number of training hours	857	655
% of trained employees from among newly hired	83%	81%

Comarch Group	2021	2020
number of people participating in training	951	667
total number of training hours	951	667
% of trained employees from among newly hired	73%	78%

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 2020 – 2021.

Comarch Group	2021	2020
number of people participating in IMS training (people newly hired and repeating the training after 5 years)	1,878	1,556

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 these companies contain provisions to provide training in the field of human rights and provide Comarch with statements confirming the completion of training by employees.

4.4. 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.

4.5. „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.

4.6. 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. 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.

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. 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.

4.7. 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 29th of April, 2022, the Management Board of Comarch S.A. submitted a statement on the application of corporate governance principles by Comarch S.A. in 2021.

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 2021.

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 2021, 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 2020 – 2021.

Suppliers of Comarch S.A. - share of purchase value from suppliers in each location	2021	2020
Poland	84%	87%
DACH	4%	4%
Europa-other	7%	7%
Americas	2%	1%
Other	3%	1%

Comarch business region - share of purchase value from suppliers in each location	Local suppliers %		Foreign suppliers %	
	2021	2020	2021	2020
Poland	89%	91%	11%	9%
DACH	35%	31%	65%	69%
Europa-other	24%	22%	76%	78%
Americas	45%	31%	55%	69%
Other	13%	13%	87%	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 2021 amounted to 96% of the value of liabilities and 95% in the Comarch Group. In 2020, the rate of payments received on-time in Comarch S.A. amounted to 95% of the value of liabilities and 94% in the Comarch Group

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 2020 – 2021 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 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%	70.5%	62.0%
Comarch Group	81.6%	65.1%	73.4%	73.4%	64.7%

Key Manufacturers and Subcontractors in 2020	Ethics	OHS	Human rights	Respect for the environment	Human rights including the prohibition of child labour or forced labour
Comarch S.A.	80.0%	57.7%	65.1%	57.7%	65.1%
Comarch Group	81.1%	59.3%	66.3%	59.3%	66.3%

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 2020, 487 surveys (including periodic surveys) were sent, completed by 29 suppliers. 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.

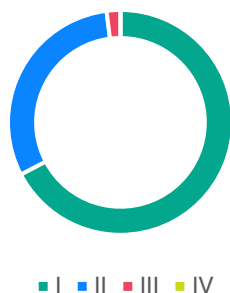
In the next stage of the analysis, after the execution of the order, the quality of cooperation is also evaluated. Included are: flexibility in solving problems, information flow during the process of ordering, keeping the delivery deadline / performance of the service, compliance of the order with the 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 2020 – 2021.

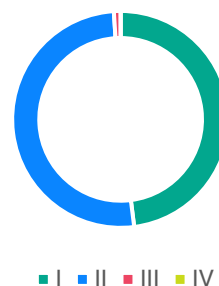
Categories assigned to suppliers	I	II	III	IV
2021	68%	30%	2%	0%
2020	48%	51%	1%	0%

The categories were assigned based on the results of the evaluation of cooperation with 345 entities in 2020 and 605 entities in 2021.

Assessment of cooperation in 2021



Assessment of cooperation in 2020



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 2021 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 (Journal of Laws of 2021, item 1129 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 2021, 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), the Personal Data Inspector has been appointed and 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 2021 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 2021, fourteen infringements of personal data protection in Comarch S.A. were reported, whereas sixteen 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 employee awareness in the area of personal data protection, in connection with the ongoing training and instructions implemented on an ongoing basis, translates into not duplicating existing violations, better detectability, and thus also affects the prevention of further infringement.

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.

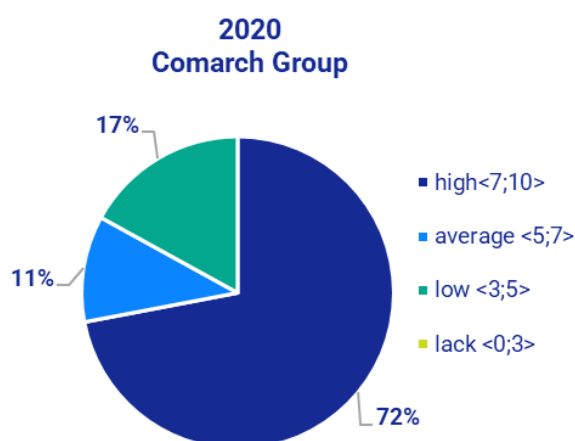
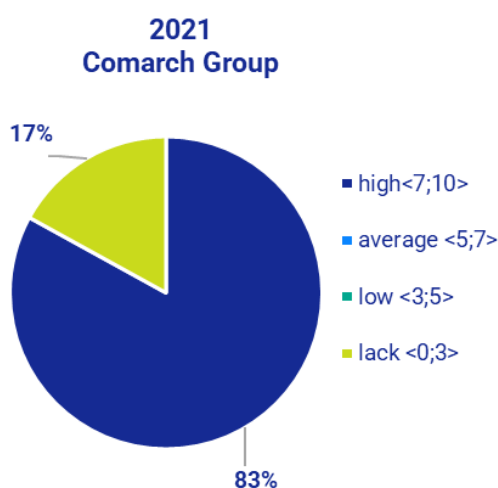
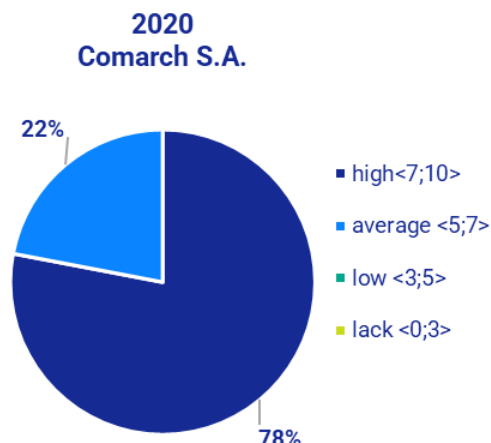
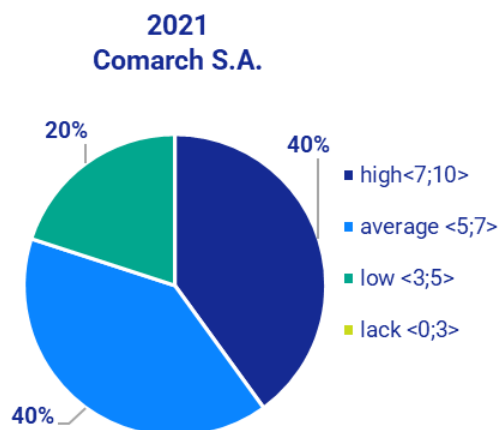
The basic element of the survey is a short on-line questionnaire sent to our clients, which contains closed questions with grades 1-10 and open-ended questions. Respondents are divided into three groups of clients: management, project managers and users.

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 2020 – 2021 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, satisfaction with the Comarch Group prices compared to their quality, 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:

- High personal culture and the ability to communicate,
- Expertise of employees,
- Quality of services provided,
- Customer focus,
- Individual approach to the client;
- Product quality.

In 2021, due to the change of the IT platform for conducting customer satisfaction surveys, the total number of questionnaires sent was lower by nearly 60%, and the number of responses received by almost 80% compared to 2020. As a result of this change, the results are not as reliable as in previous years. The customer satisfaction level survey will be conducted in full in 2022. The results obtained in 2021 confirm that the consistently highly rated aspects are the timeliness of work, the level of services provided, customer orientation, as well as communication skills, competences and high culture of Comarch employees.

6. Human Resources

6.1. Employment in the Comarch Group 2017-2021

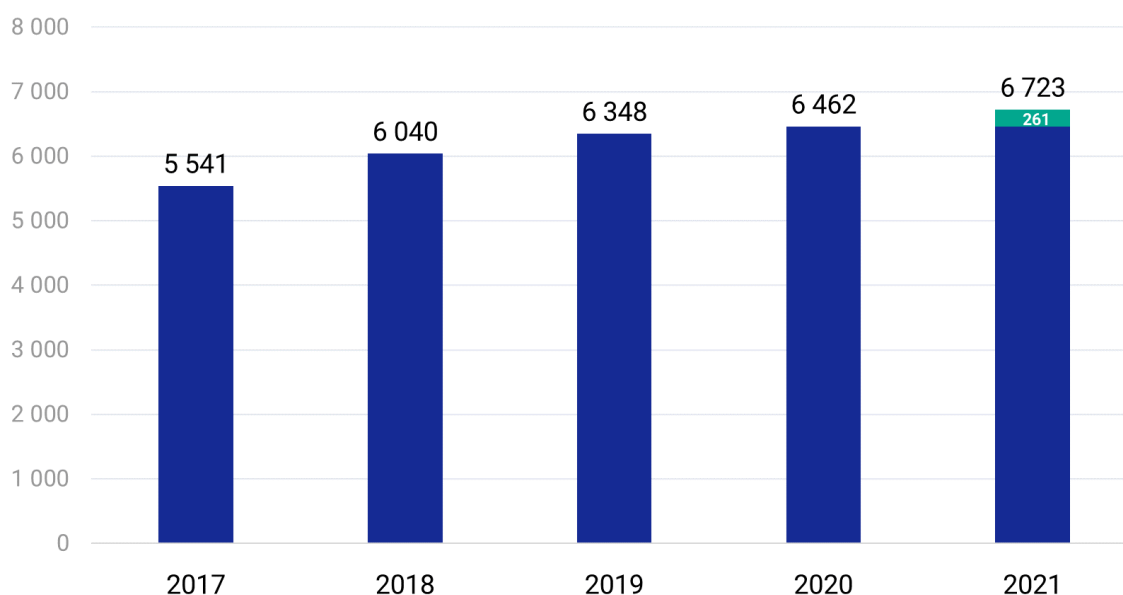
Number of employees

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 20 branches located in urban centres in Poland. As at 31st of December, 2021, 3,720 employees were employed in Krakow, 2,387 in other cities in Poland and 616 outside of Poland.

As at 31st of December, 2021 at Comarch S.A. 5,206 people were employed compared to 5,006 people employed as at 31st of December, 2020, while in the entire Capital Group the number of employees increased to 6,723 people compared to 6,462 people as at 31st of December, 2020.

The chart below shows the number of people employed in the Comarch Group in 2017 – 2021.



The tables below present the average number of people employed at Comarch S.A. and in the Comarch Group in 2017 – 2021.

Average number of employees in Comarch S.A.	2021	2020	2019	2018	2017
Employment agreement	4,327	4,117	4,057	3,753	3,492
Other form of employment	887	925	930	934	844
Total	5,214	5,042	4,987	4,687	4,336

Average number of employees in Comarch S.A.	2021	2020	2019	2018	2017
Production employees and technical consultants	4,556	4,395	4,330	4,052	3,733
Marketing and sales	188	176	180	168	161
Management and administrative	414	413	414	407	372
Other	56	58	63	60	70
Total	5,214	5,042	4,987	4,687	4,336

Average number of employees in Comarch Group	2021	2020	2019	2018	2017
Employment agreement	5,427	5,119	5,087	4,727	4,393
Other form of employment	1,360	1,383	1,361	1,364	1,245
Total	6,787	6,502	6,448	6,091	5,638

Average number of employees in Comarch Group	2021	2020	2019	2018	2017
Production employees and technical consultants	5,377	5,136	5,103	4,797	4,369
Marketing and sales	370	336	321	298	293
Management and administrative	503	499	499	495	458
Other	537	531	525	501	518
Total	6,787	6,502	6,448	6,091	5,638

Due to the constant development of its activities, both Comarch S.A. and the Comarch Group systematically increase the level of employment. Employment dynamics in 2021 was clearly higher than in the previous year, in which due to the ongoing Covid-19 pandemic the employment level stabilized.

Employment rotation

S.2.2., S.2.3.

In 2021, 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

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 2020 – 2021 according to the type of contract under which the work is provided.

Type of employment	Time	Comarch S.A.		Comarch Group	
		2021	2020	2021	2020
Open-ended contract	Part-time	159	172	161	160
	Full-time	2,643	2,469	3,417	3,256
	Total	2,802	2,641	3,578	3,416
Fixed-term contract	Part-time	50	35	65	50
	Full-time	1,474	1,409	1,775	1,647
	Total	1,524	1,444	1,840	1,697
Total		4,326	4,085	5,418	5,113

Type of employment	Age	Comarch S.A.		Comarch Group	
		2021	2020	2021	2020
Open-ended contract	Under 30 years	549	527	676	877
	30-50 years	2,233	2,072	2,716	2,380
	over 50 years	20	42	186	159
	Total	2,802	2,641	3,578	3,416
Fixed-term contract	Under 30 years	1,173	1,115	1,325	1,256
	30-50 years	346	319	495	414
	Over 50 years	5	10	20	27
	Total	1,524	1,444	1,840	1,697
Total		4,326	4,085	5,418	5,113

Type of employment	Sex	Comarch S.A.		Comarch Group	
		2021	2020	2021	2020
Open-ended contract	Women	830	782	1,118	1,064
	Men	1,972	1,859	2,460	2,352
	Total	2,802	2,641	3,578	3,416
Fixed-term contract	Women	503	462	661	575
	Men	1,021	982	1,179	1,122
	Total	1,524	1,444	1,840	1,697
Other forms of employment	Women	115	111	283	286
	Men	765	810	1,022	1,063
	Total	880	921	1,305	1,349
Total		5,206	5,006	6,723	6,462

S.2.5.

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

In 2020 – 2021, 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 2020 – 2021 in individual provinces of Poland as of the last day of the year.

POLAND voivodeship	Comarch S.A.		Comarch Group	
	31 December 2021	31 December 2020	31 December 2021	31 December 2020
dolnośląskie	252	235	255	238
kujawsko-pomorskie	22	26	23	27
lubelskie	184	176	192	183
lubuskie	5	4	5	4
łódzkie	361	379	368	386
małopolskie	3,117	3,031	3,751	3,660
mazowieckie	288	278	355	338
opolskie	1	1	1	1
podkarpackie	71	60	88	66
podlaskie	33	22	36	36
pomorskie	84	80	118	113
śląskie	490	448	607	550
świętokrzyskie	52	44	55	47
warmińsko-mazurskie	1	1	1	1
wielkopolskie	245	221	251	226
zachodniopomorskie	-	-	1	2
Total	5,206	5,006	6,107	5,878

Comarch S.A. and the Comarch Group diversifies the risk of restrictions on the availability of human resources by operating in 20 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 2020 – 2021 in individual countries as of the last day of the year.

FOREIGN COUNTRIES			
country	31 December 2021	31 December 2020	
Saudi Arabia	1	1	
Australia	2	1	
Austria	12	11	
Belgium	24	23	
Brazil	8	9	
Chile	7	9	
France	125	110	
Spain	-	7	
Holland	2	3	
Japan	6	4	
Columbia	3	3	
South Korea	2	2	

Malta	4	-
Mexico	1	-
Germany	231	232
Panama	10	4
Peru	3	1
Russia	3	3
United States	22	18
Switzerland	20	20
Sweden	1	1
Thailand	19	14
Turkey	1	1
Ukraine	73	65
Great Britain	11	13
Italy	15	20
United Arab Emirates	10	9
Total	616	584

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 2020 – 2021.

Year	Management Body	Age	Woman	Man	Total
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
31 December 2020	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
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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 2020 – 2021.

Year	Management body	Age	Woman	Man	Total
31 December 2021	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
	31 December 2020	Supervisory Board	under 30 years	-	-
30-50 years			3	22	25
over 50 years			4	12	16
Total			7	34	41
Management Board		under 30 years	1	-	1
		30-50 years	12	113	125
		over 50 years	4	23	27
		Total	17	136	153
Total			24	170	194

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 *	2021			2020		
	Woman	Man	Total	Woman	Man	Total
administration	274	77	351	256	73	329
managerial staff	142	473	615	138	449	587
production	842	2,350	3,192	784	2,221	3,005
other	75	93	168	66	98	164

Total	1,333	2,993	4,326	1,244	2,841	4,085
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* employed on the basis of employment contracts

Comarch Group		2021			2020		
Categories of employees *	of	Woman	Man	Total	Woman	Man	Total
administration		405	128	533	380	117	497
managerial staff		209	570	779	173	524	697
production		951	2,588	3,539	936	2,648	3,584
other		214	353	567	150	185	335
Total		1,779	3,639	5,418	1,639	3,474	5,113

* 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.

Comarch S.A.		2021			2020			
Categories of employees *	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	136	207	8	351	120	195	14	329
managerial staff	38	572	5	615	32	544	11	587
production	1,495	1,686	11	3,192	1,432	1,548	25	3,005
other	53	114	1	168	58	104	2	164
Total	1,722	2,579	25	4,326	1,642	2,391	52	4,085

* employed on the basis of employment contracts

Comarch Group		2021			2020				
Categories of employees *	of	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		196	299	38	533	173	288	36	497
managerial staff		47	659	39	745	40	629	28	697
production		1,658	2,023	118	3,799	1,585	1,887	112	3,584
other		100	230	11	341	113	212	10	335
Total		2,001	3,211	206	5,418	1,911	3,016	186	5,113

* employed on the basis of employment contracts

In 2021, the number of people employed in the age group 30 -50 years old increased the fastest.

		2021			2020			
Categories of employees * Comarch S.A.	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	346	5	-	351	326	3	-	329
managerial staff	610	5	-	615	583	4	-	587
production	3,128	57	7	3,192	2,943	54	8	3,005
other	159	6	3	168	154	6	4	164

Total	4,243	73	10	4,326	4,006	67	12	4,085
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* employed on the basis of employment contracts

Categories of employees * Comarch Group	2021				2020			
	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	464	53	16	533	429	54	14	497
managerial staff	681	43	21	745	644	36	17	697
production	3,437	263	99	3,799	3,241	252	91	3,584
other	235	68	38	341	228	75	32	335
Total	4,817	427	174	5,418	4,542	417	154	5,113

* 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 2021 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 2020 – 2021.

Categories of employees	Comarch S.A.		Comarch Group	
	2021	2020	2021	2020
administration	91%	90%	93%	88%
managerial	66%	63%	76%	70%
production	76%	76%	82%	88%
other	82%	74%	83%	76%

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 2020 – 2021.

	Sex	Comarch S.A.		Comarch Group	
		2021	2020	2021	2020
The number of people who took of maternity/paternity leave	Woman	98	93	133	127
	Man	5	5	16	15

	Total	103	98	149	142
The number of people who returned to work after the maternity/paternity leave	Woman	87	91	109	113
	Man	5	5	15	14
	Total	92	96	124	127
Return to work rate ^{a)}	Woman	98%	92%	82%	89%
	Man	100%	83%	94%	100%
Number of people who returned to work after maternity/paternity leave and was still employed for 12 months after returning to work	Woman	85	70	104	89
	Man	5	1	8	7
	Total	90	71	112	96
Employment maintenance rate ^{b)}	Woman	93%	88%	89%	83%
	Man	100%	100%	73%	66%

^{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. and MKS Cracovia SSA implemented Employee Capital Plans managed by Aviva Specjalistyczny Fundusz Otwarty PPK managed by Aviva Investors TFI S.A. In 2021, the agreements for running and managing Employee Capital Plans were signed by Comarch Finance Connect Sp. z o.o., Comarch Cloud S.A. and Wszystko.pl sp. z o.o. 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 2020 – 2021.

In thousand PLN	2021	2020
Comarch S.A.	3,124	2,486
Comarch Group	3,764	3,021

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. Elections are held every few years, this is regulated by the provisions of the act.

Works councils in the DACH area:

- Comarch Solutions GmbH – Innsbruck, the company is also subject to the tariff agreement,
- Comarch AG – Munich,
- 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 2021 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 company. On average approx. 10,000 participants a year participate in over 300 training programs conducted by 80 qualified trainers.

The tables below present the average number of training hours per employee (by gender and employment category) in 2020 – 2021.

Comarch S.A.	2021			2020		
All trainings	managers	others	total	managers	others	total
women	2.84	16.48	15.07	5.39	11.38	10.77
men	2.21	22.74	19.66	5.01	12.78	11.83
Total	2.36	20.74	18.25	5.10	12.39	11.54

Comarch S.A.	2021			2020		
Internal trainings	managers	others	total	managers	others	total
women	2.49	14.51	13.27	5.39	10.33	9.83
men	2.16	20.74	17.95	4.70	11.72	10.85
Total	2.24	18.75	16.51	4.87	11.33	10.58

Comarch Group	2021			2020		
All trainings	managers	others	total	managers	others	total
women	2.36	14.94	15.32	4.53	8.29	8.79
men	2.08	25.49	20.39	4.37	11.56	10.28
Total	2.15	21.56	18.76	4.41	10.50	9.84

Comarch Group	2021			2020		
Internal trainings	managers	others	total	managers	others	total
women	2.08	15.15	13.69	4.53	8.45	8.09
men	2.03	21.59	18.46	4.11	10.16	9.46
Total	2.04	19.44	16.92	4.21	9.64	9.06

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.	2021	2020	Comarch Group	2021	2020
All trainings			All trainings		
women	1,080	801	women	1,337	968
men	2,837	2,359	men	3,308	2,633
Total	3,917	3,160	Total	4,645	3,601

Comarch S.A.	2021	2020	Comarch Group	2021	2020
Internal trainings			Internal trainings		
women	114	32	women	123	32
men	229	87	men	268	93
Total	343	119	Total	391	125

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

The 19th edition of the Comarch internship took place during the summer holidays. It is the largest project of this type in Europe. The internship program is addressed to students of the best technical universities in Poland. Every year, the management board, managers of all levels and administrative departments attach great



importance to the organization of the preparation and implementation of the internship program. 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.

Every year, the interest of students translates into a large number of applications. 4,112 candidates applied for participation in the internship program in 2021 (14 people for one place, as in 2020).

In the recruitment process, the candidates first faced difficult technical tests. 2,598 candidates were invited to participate in the tests. The attendance at the tests was 90%. The knowledge and competences of students who obtained the best results in the tests were additionally verified during recruitment interviews conducted by managers.

Once again, the internship in the UX / UI profile, for which we received 265 applications from candidates (in the previous edition - 200 applications), enjoyed record popularity. Candidates were required to present a portfolio of design work. The creative director, who was personally involved in the recruitment, emphasized the very high level of recruitment. Finally, 14 interns were qualified for an internship in the UX / UI profile.

298 people took part in the 19th edition of Comarch's internship program in 2021. The internship took place in 12 cities in Poland, and students had a choice of 7 profiles: programming, system engineer, Embedded, telecommunications, AI / ML, cybersecurity and UX / UI. 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.

After the internship, 260 interns were employed at Comarch, which accounts for 87% of all interns.

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

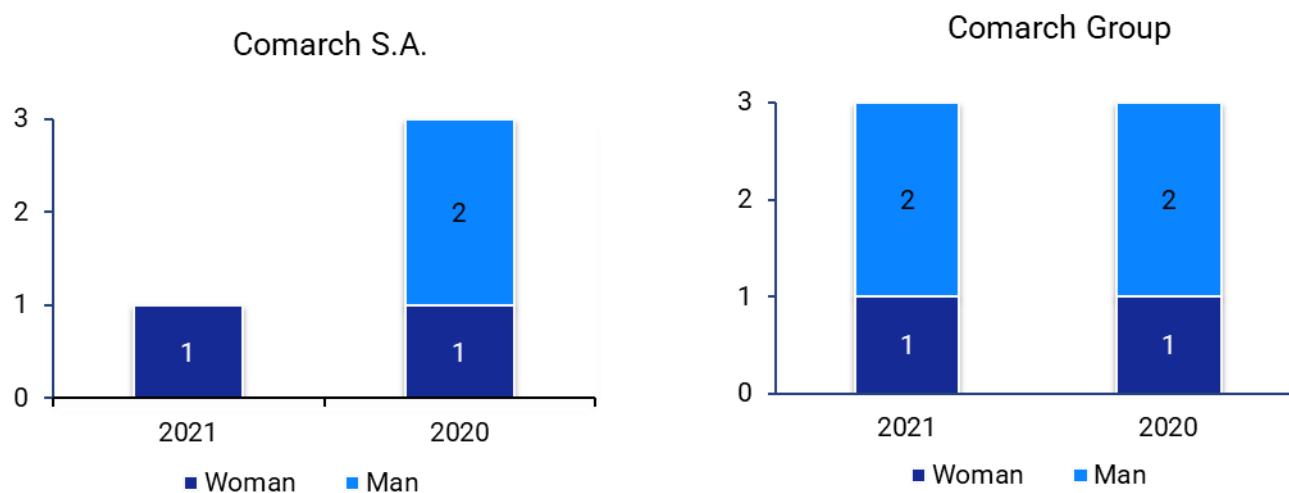
In the Comarch Group, the circumstances and causes of accidents are determined by a two-person post-accident team appointed for this purpose by the Employer, which includes an employee of the OHS Service and an Employee Representative, in accordance with applicable regulations. Protocols determining 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 2021, 3 events took place in the companies of the Comarch Group, 2 of which were recognized as accidents at work and 1 as an accident treated on a par with an accident at work (the event took place during a business trip / delegation).

The charts below show the number of accidents at work in Comarch S.A. and in the Comarch Group in 2020 – 2021.



All 3 incidents were classified as light and individual accidents.

Summary of Data on Accidents at Work in 2020-2021

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

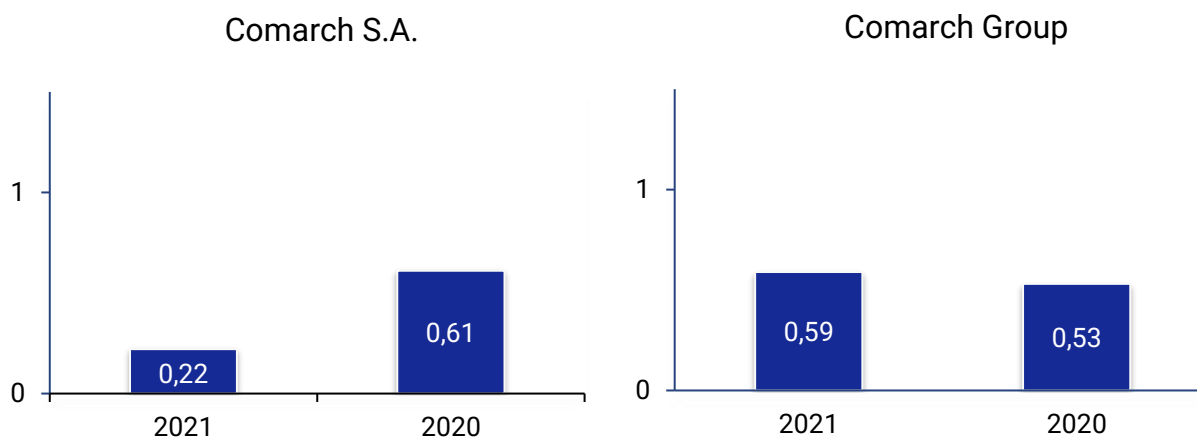
- accident frequency index, expressed as the ratio of the number of accidents to the number of working people (per 1,000 people), and
- accident severity index, expressed as the ratio of the number of days lost due to accident absenteeism to the total number of accidents (this index does not include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

The table below presents the accident rates for the Comarch Group and Comarch S.A. in the years 2020 – 2021.

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
2020	3	3	1	1	0.61	0.53	0.50	0.50
2021	1	3	-	57	0.22	0.59	0.00	19.00

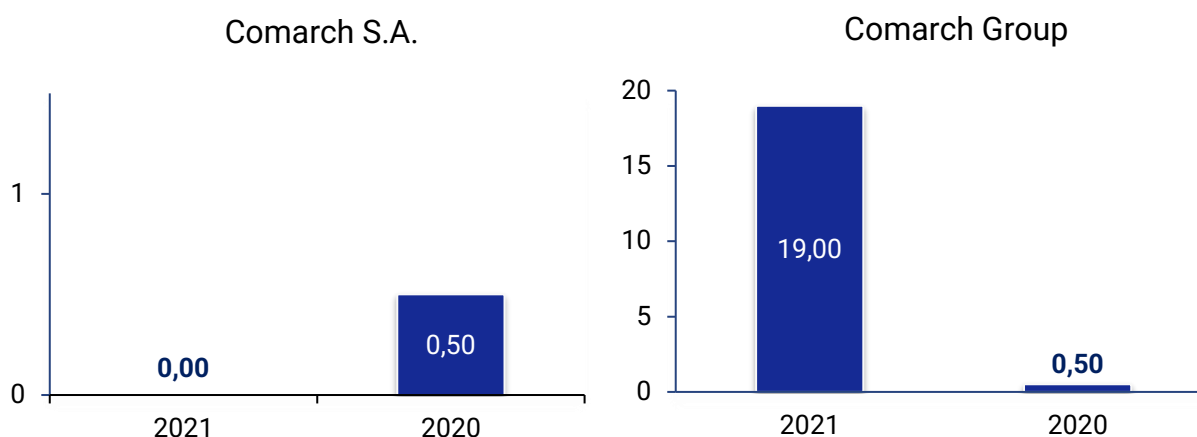
In 2021, the number of accidents at Comarch S.A. decreased compared to 2020. However, for the entire Comarch Group, the number of accidents remained unchanged (3 accidents). In 2021, the number of absenteeism days caused by accidents at work significantly decreased from 1 day to 57 days– for the Comarch Group.

The charts below show the accident frequency rate for Comarch S.A. and the Comarch Group in 2020 – 2021.



The rate of accidents at work in 2021 at Comarch S.A. was 0.22, while for the entire Comarch Group it was 0.59. Comparing to 2020, a significant decrease of this ratio was recorded in Comarch S.A. (this is due to the decline in the number of accidents at work) and slight increase in Comarch Group (this is due to a slight decrease in employment).

The charts below show the accident severity rate for Comarch S.A. and the Comarch Group in 2020 – 2021.



Accident severity rate at work in 2021, for Comarch S.A., was 0.00, while for Comarch Group was 19.00. Comparing to 2020, a significant decrease in Comarch S.A. was recorded (it results from zero accident absenteeism) and an increase in Comarch Group (this is due to the increase in the number of absenteeism days caused by accidents at work).

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 145 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. During the training, Rescuers have a practical opportunity to become familiar with handheld extinguishing agents. The last training took place in July, 2021, and 57 people took part in it. The next training is planned for 2023.

Rescuers operate on the basis of internal procedures developed and communicated to them.

All the employees have an access to the first aid kits equipped in accordance with the internal instructions developed on the basis of DIN 13157, located in security rooms in each company building. Each employee is required to read the current version of the Fire Safety Instructions, which are updated every 2 years (in accordance with applicable regulations). Trial evacuations are carried out in all locations, in which employees and rescuers participate.

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

Management Board of Comarch S.A. 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. Comarch S.A. implemented all the guidelines recommended by the Chief Sanitary Inspectorate and other state institutions in the countries of the company's operational activity, with particular emphasis on the recommendations regarding the safety, 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. In 2021, Comarch Group organized a vaccination campaign against Covid-19 for employees, co-workers and their family members. 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.

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. Due to the high activity of the Comarch Group

in the area of corporate social responsibility, work is underway on a comprehensive CSR policy for the Comarch Group, regulating the issues described above. 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 2021, 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 for Cracow Music Center

Comarch S.A. in 2021, he supported the initiative of building the Krakow Music Center with a financial donation. As a result of the investment, a modern concert hall with an audience of 1,000 seats will be created, equipped with a stage for 120 musicians and a balcony that can accommodate an 80-person choir, as well as a hall for 300 people, multi-functional rehearsal rooms, dressing rooms, offices of municipal orchestras, as well as a creative space with a place for music education.

Comarch Plays with Last Night of the Proms

For another year in a row, Comarch sponsored 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 jubilee concert took place at the Krakow Opera, and the soloists were accompanied by the Beethoven Academy Orchestra. The program includes, among others compositions by Szymanowski, Adams, Puccini and Wood. The concert was organized for the 26th time

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 18,900 ml of blood. The action was organized in cooperation with the iMed24 Medical Center and the Regional Blood Donation and Treatment Center in Krakow.

For Pets

Organizations that help homeless animals also need help. In 2021, 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, Katowice, Gliwice and the La Fauna Foundation, Ex Lege Foundation.

Christmas Help

As in previous years and in 2021, 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", Zakątek Orphanage, Lublin Hospice of the Little Prince for Children, Youth House in Poznań.

IT Equipment for Those in Need

In 2021, Comarch S.A. made a donation of several hundred pieces of computer equipment, incl. for the Stefan Żeromski Hospital, numerous schools, orphanages, hospices 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 Javeloper, 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 2021, a strategic partnership was also established with the AGH University of Science and Technology in Krakow 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.

The Largest Internship Program in Europe

The 19th edition of the IT internship took place during the summer holidays. It is the largest project 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 600 educational facilities and institutions equipped with educational versions of Comarch ERP),
- ERP meetings and seminars for lecturers and students, teachers and students of vocational schools,
- training in Comarch ERP systems for pedagogical staff,
- other educational programs and events 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, e-mobility 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.

7.3. Sport and Healthy Lifestyle

For over 25 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. In the season 2021/2022, together with the partner company Infortes, Comarch is a sponsor of the top league basketball team, Śląsk Wrocław. 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.

Cycling to Work

The Comarch Group encourages employees to come to work by bike in the spring and summer months, providing bicycle infrastructure (e.g., stands, bicycle room, repair stations and changing rooms with showers) and occasional bicycle-related campaigns (organization of bicycle services for company employees, „Bikes & Breakfast” event).

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

In 2021, employees from branches in Kraków, Śląsk, Lublin, Wrocław, Warszawa, Poznań, Łódź and Gdańsk participated in the Poland Business Run 2.0 charity run. Although it was another edition carried out in a new formula, it remained unchanged that, although separately, they fought together for a good cause and support for people with physical disabilities.

Among other events on which Comarch teams appeared, one can mention, among others, Cracovia Półmaraton Królewski, Biegnij Warszawo, 4Rest Run.

Charity Sports Competition

Three months of competition, three 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 70,000 km in total. Thanks to the involvement of employees, it was possible to achieve the goal and financially support the Unicorn Association, which helps people suffering from cancer and their relatives.

Catch the balance

Good energy of employees is the basis of a well-functioning organization. That is why, especially in 2021, Comarch launched a wellbeing program - 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.

First of all, prevention

In 2021, Comarch Healthcare became a partner of the "Onkooddzialni" campaign, initiated by the NEO Hospital Group. The aim of the action was to draw attention to the need for prophylaxis and to show the possibilities of diagnostics and modern treatment of gynecological neoplasms in women. As part of the campaign, free tests for women were carried out, live meetings with doctors and psycho-oncologists who shared their experiences and answered questions: how to take care of health, how to react when an oncological disease occurs, where to look for help, what is the role of personalized care and how new technologies affect recovery. During the meetings, female patients who fell ill with cancer also shared their perspectives. Comarch employees were also invited to participate in the webinars.

In addition, the company was involved in the educational campaign of Gazeta Wyborcza "Łap za Bust", which concerned the prevention of breast cancer (webinars with specialists, educational materials in the press and on the Internet, and at an open-air exhibition in Łódź). In addition, as part of the campaign, women working in the company's branch I Łódź, as well as mothers and partners of employees, could take advantage of free tests, and were also included in the genetic program "Early detection of malignant neoplasms in families of high, hereditary risk of developing breast and ovarian cancer. "

Soccer struggles

The company encourages physical activity 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.

Safe fleet

In 2021, Comarch Group employees participated in training courses organized together with PZU as part of the Safe Fleet program. As part of this project, five training courses were held, attended by a total of sixty employees. The classes were conducted in two variants: Training in defensive driving with elements of eco-driving (24 people) and improving the technique of driving a passenger car (36 people).

7.4. On-Line Activity and Integration

Comarch cares about a good working atmosphere and attaches great importance to employee relations. Despite the inability to organize traditional events, Comarch took initiatives to integrate employees and teams. Many actions were taken directly by the managers of individual teams.

A field Game on the Occasion of Children's Day

In cooperation with the Central House of Technology, a modern educational centre in which Comarch is a strategic partner, an online field game for employees' families was organized. Two versions of the game were prepared - "Lame Pirate Joe" for younger children aged 8-10 and "Robot City" for older children aged 11-13.

CS Tournament: Go

The competition integrated the fans of this legendary game, this time the event was organized internally and teams from various Comarch offices participated.

7.5. Activities Implemented in 2021 by MKS Cracovia SSA

In 2021, there were many activities for Corporate Social Responsibility. Comarch, despite the difficult circumstances at the beginning of this period, related to the coronavirus pandemic, created good CSR practice using the Cracovia brand. In later months, Cracovia's brand activities during the PKO BP Ekstraklasa top league soccer games and Polish Hockey League seasons could more widely promote corporate responsibility practices 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 2021, a medal for winning the Polish Cup by Cracovia soccer players was donated for auction. The amount for which the winner auctioned the souvenir amounted to almost PLN 10,000.

Support for Charity Collections

Using the numerical potential of Cracovia's social media, Comarch has repeatedly appealed for people to join fund-raisers for children's treatment. One example was a fundraiser for the treatment of little Hania suffering from Smith-Lemli-Opitz syndrome.

Comarch actively joined a fundraising campaign to buy a prosthetic leg for a soccer player who represents Poland in AMP Football. The campaign was initiated by Cracovia's technical partner Puma and the ambassador of the brand, Kacper "Qesek" Misztal, a well-known YouTuber.

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.



International Holocaust Remembrance Day

Comarch being aware of the importance of memory as a carrier of national tradition, joined the celebration of the International Holocaust Remembrance Day. Posts devoted to this event were published using the Club's social media.

Historical Memory

Comarch also remembers about heroes and dates and events important for Polish history. Cracovia, through its social media channels, regularly promotes patriotic issues, knowing how important an element in maintaining national identity is history.

Auctions for Development Purposes

Comarch also tries to support organizations that promote physical culture and history. One of the examples was the donation of a match jersey to reactivate the pre-war Polish football club - Lechia Lwów.

Day of Combating Discrimination of Disabled Persons

Comarch, in cooperation with 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.

Cooperation to Promote Mental Health Among Young People

Comarch actively joined the action under the slogan "WALK, WIN, LIVE!" During the 28th and 29th rounds of PKO BP Ekstraklasa top league games, Cracovia players ran onto the pitch wearing T-shirts promoting the initiative. The aim of the campaign was to change public attitudes towards consultation or advice from a psychologist or therapist.

Celebration of the Krakow Family

MKS Cracovia SSA and Comarch also joined in the 9th edition of the Kraków Family Festival. This is a cyclical event which has become a permanent feature in the calendar of cultural and family initiatives organized in Kraków. It promotes sports, cultural and recreational activities offered to Kraków families, as well as the city's offer to families, including support and assistance activities.

„The Stripes” Children's Day

After a one-year break dictated by the epidemic situation, Cracovia returned to the tradition of organizing the Striped Children's Day. Thanks to Comarch, the youngest fans were awaited by, among others visiting the Stadium, raffle, demonstration training and the Cracovia Kids tournament.

Promotion of the Civic Budget

Comarch, together with MKS Cracovia SSA, joined in the promotion of the project as part of the civic budget. The project envisaged the creation of a multimedia historical zone, connected to the Aleja Zasłużonych (Avenue of the Deserving) and a soccer playground for children at the Cracovia stadium.

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.

Cracovia Supports the Fair-Play Attitude

An element of education at MKS Cracovia SSA is the care for promoting a sports attitude among the youngest players. During one of the Cracovia KIDS training sessions, seven-year-old Lidka made an endearing gesture towards her peer, who helped her friend. Comarch and MKS Cracovia SSA decided to prepare a surprise for the girl in the form of meetings with players and small gifts. During children's and youth ice hockey tournaments at the Krakow ice rink, Comarch organized numerous lectures for children and parents, reminding them of the overriding role of fair-play rules, mutual respect and a healthy lifestyle among young athletes.

Help for the shelter at Rybna Street

Comarch, in cooperation with MKS Cracovia SSA, joined the collection of gifts and donations for the Krakow shelter at Rybna Street. We managed to collect nearly PLN 1,000, as well as the most necessary supplies for animals in need.

Charity Tournament for the Cup of the President of Professor Janusz Filipiak

At the beginning of October, a charity tournament for the Cup of the President of Professor Janusz Filipiak was held. One of the elements of the event was a lottery and an auction of sports memorabilia. All income went to the Małopolska Hospice for Children in Krakow, supporting its daily activities.

Vaccination Action in Front of the Stadium

Before the meeting with Jagiellonia Białystok, Comarch and MKS Cracovia SSA organized the possibility of vaccination against the SARS-CoV-2 virus. For everyone vaccinated on Saturday, there was a ticket for a match for a symbolic PLN 1.

Prophylaxis against Covid-19

During the Continental Cup tournament, Comarch took care of prevention and education in the field of COVID-19. At the Ice Rink, volunteers informed the fans about the need to apply measures to prevent the spread of the virus, and educated the public about how to protect health and counteract the pandemic.

World First Aid Day - Information Campaign

Before the match with Górnik Zabrze, Comarch, in cooperation with MKS Cracovia SSA, conducted an information campaign in connection with the World Day of First Aid. First aid demonstrations were carried out in the family sector, and in addition, before the match, special cards in the format of business cards with a list of the basic and most important resuscitation steps were distributed.

The #Safe House Campaign

Before the match against Raków Częstochowa, Comarch together with MKS Cracovia SSA conducted an information campaign related to security. During the meeting, the animators taught the youngest about fire protection, road and home safety, thus investing in the future and education of children.

Preventive Campaign "Movember"

Comarch once again supported the "Movember" campaign reminding about male health problems and encouraging regular examinations and prophylaxis of testicular and prostate cancer. The hockey players together with the employees of the MKS Cracovia SSA Club during the matches promoted the above-mentioned idea and encouraged the fans to a healthy and hygienic lifestyle.

Support for Honorary Blood Donation and Bone Marrow Donors

During the Continental Cup at the ice rink at 7 Siedleckiego Street, Comarch supported the "Vampiriada" initiative, which promotes voluntary blood donation and encourages people to join the bone marrow donor base, thus making the public aware of the need to save lives by donating blood and bone marrow.

Szlachetna Paczka (Noble Package)

During the holiday season, Comarch has traditionally joined the Szlachetna Paczka campaign, which is about helping people in need. The athletes of Cracovia were responsible for this task. This year we helped two single families, Mr. Henryk and a pensioner, Mrs. Maria.

7.6. Donations and Sponsorship

S.9.4.

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 2020 – 2021.

in thousands PLN	2021	2020
Comarch S.A.	1,185	91
<i>the largest recipients</i>	<p><i>Agencja Rozwoju Miasta Krakowa (Krakow City Development Agency)</i></p> <p><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)</i></p>	<p><i>Fundacja Słonie Na Balkonie (Elephants on the Balcony Foundation)</i></p> <p><i>Chorągiew Kujawsko - Pomorska ZHP (The Kujawsko-Pomorska Banner of the Polish Scouting Association)</i></p>
Comarch Group	1,204	91
<i>the largest recipients</i>	<p><i>Agencja Rozwoju Miasta Krakowa (Krakow City Development Agency)</i></p> <p><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)</i></p>	<p><i>Fundacja Słonie Na Balkonie (Elephants on the Balcony Foundation)</i></p> <p><i>Chorągiew Kujawsko - Pomorska ZHP (The Kujawsko-Pomorska Banner of the Polish Scouting Association)</i></p>

S.9.5.

The table below shows the total amount spent by Comarch S.A. and the Comarch Group in 2020 – 2021.

In thousands PLN	2021	2020
Comarch S.A.	6,600	6,600
<i>the largest sponsored partners</i>	<i>MKS Cracovia SSA</i>	<i>MKS Cracovia SSA</i>

Comarch Group	6,642	6,736
<i>the largest sponsored partners</i>	<i>MKS Cracovia SSA</i>	<i>MKS Cracovia SSA</i>

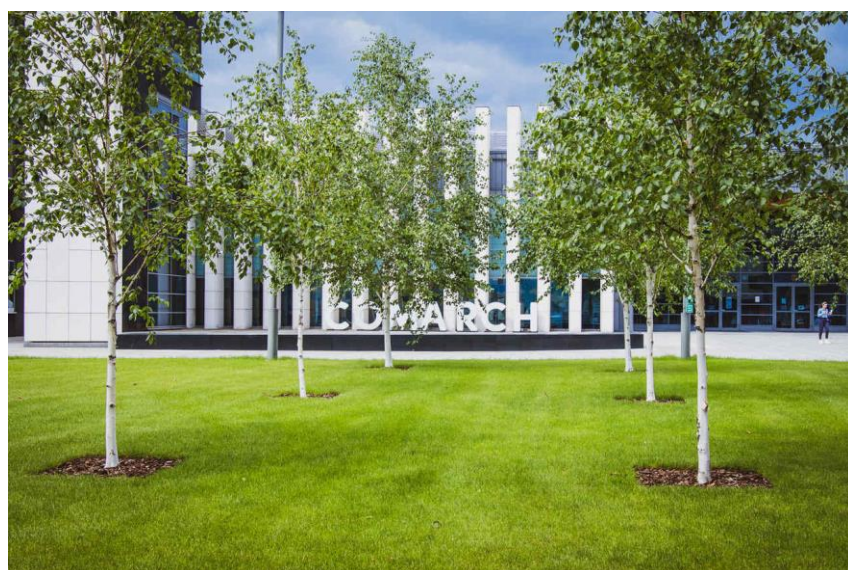
S.9.6.

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 it monitors, supervises and influences.



All the Companies of the Comarch Group comply with local legal provisions regarding environmental protection. Comarch consciously limits the negative impact of its activities on the natural environment, minimizes the consumption of natural resources and limits the production of waste arising from ongoing operations. It also promotes an ecological lifestyle among its employees, running campaigns to encourage active participation in environmental protection.

In Comarch S.A. the Energy Management System has been implemented and certified in accordance with the international standard ISO 50001. Under this system, a number of actions are taken to improve the company's energy efficiency, mainly in the areas of so-called significant energy consumption (electricity, heat, fleet). 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 of relevant indicators. The listed activities are implemented as part of energy programs and tasks for a given period and are subject to periodic monitoring during energy inspections carried out by the appointed Energy Management Team.

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 with a sensor installed on one of its 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. Among the raw materials used, the following were identified: natural gas, liquid fuels (gasoline and diesel), heating oil, and aviation fuel were identified. However, they use typical utilities consumed in the course of their current work (electricity, heat and water).

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.

In addition, paper, cardboard, 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. The number of introduced packaging 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 2020 – 2021.

Packaging launched on the market	2021	2020
Comarch S.A.	762 kg	545 kg
Comarch Group	935 kg	1,075 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. The amount of energy consumed by products is not possible to accurately estimate, because it depends on many factors, including on the intensity of use, weather conditions, operating mode and the type of accessories attached to the devices.

The Comarch Group sets itself one of the main goals to reduce electricity consumption in each subsequent version of a given device. This is done by optimizing power consumption in both the Firmware and Hardware areas. Examples include using energy-efficient technologies, such as NB IoT, or using components that use less energy.

The Comarch Group also provides solutions which support water, electricity and gas suppliers in monitoring transmission networks. This allows for reduced utility losses, quick fault detection, and consequently less consumption of the earth's natural resources. 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 2020 – 2021.

E.8.2	Revenue from products and related services developed taking into account environmental criteria	2021	2020
	Comarch S.A.	2.4%	1.8%
	Comarch Group	2.7%	2.4%

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) and two buildings in Warsaw (at Puławska and Leśna Streets), excluding the building SSE1, whose area is rented by external entities.

In the Comarch approach, is also taken into account consumption for buildings belonging to Comarch Group companies in Dresden, Germany, Lezennes in France, iMed24 Medical Centre in Krakow and for a building in Łódź at Jaracza 78 Streets. In 2021, the buildings of MKS Cracovia at Wielicka, Siedleckiego, Kałużna and Rączna Streets were added to the scope of reporting. Data for 2020 have been updated accordingly.

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 ¹⁾	2021	2020
Consumption of energy ²⁾	16,046,906 kWh	17,364,894 kWh
Consumption of heat ³⁾	4,510,190 MJ	4,037,720 MJ
Consumption of natural gas ⁴⁾	513,742 m ³	465,673 m ³
Consumption of gasoline ⁵⁾	248,459 kg	250,681 kg
Consumption of diesel fuel ⁵⁾	29,883 kg	28,026 kg
Consumption of LPG ⁵⁾	-- kg	519,kg
Consumption of aviation fuel ⁶⁾	20,527 kg	-- kg
Total consumption of energy ⁷⁾	96,330,898 MJ	97,966,207 MJ
Consumption of energy/employee ⁷⁾	18,504 MJ/employee	19,570 MJ/employee

1) Electricity consumption is presented for buildings located in Poland owned by Comarch S.A. i.e., buildings in the Special Economic Zone (SSE2, SSE3, SSE4, SSE5, SSE6, SSE7) and two buildings in Warsaw (at Puławska and at Leśna Streets).

2) Electricity consumption is presented for buildings located in Poland owned by Comarch S.A. i.e., buildings in the Special Economic Zone (SSE2, SSE3, SSE4, SSE5, SSE6, SSE7) and two buildings in Warsaw (at Puławska and Leśna Streets). The total electricity consumption for these buildings is shown. Electricity consumption in 2021 decreased by approx. 7.6% compared to 2020.

3) Heat consumption is presented for buildings SSE5, SSE6, SSE7. The total heat consumption for these buildings is shown converted to MJ. Heat consumption in 2021 increased by approx. 11.7% compared to 2020.

4) Gas consumption is presented for buildings located in Poland owned by Comarch S.A., i.e., buildings in the Special Economic Zone (SSE2, SSE3, SSE4) and buildings in Warsaw (at Puławska and Leśna Streets). The total gas consumption for these buildings is presented in cubic meters. Gas consumption increased by approximately 10.3% compared to 2020.

5) The consumption of gasoline, diesel and LPG is presented for:

- gasoline: the total gasoline consumption for the car fleet in Poland and the fuel used in low-speed equipment is presented.
- diesel oil: the total consumption of diesel oil for the car fleet in Poland and oil used in machines and aggregates used for emergency power supply is presented.
- LPG: consumption of LPG propane-butane LPG for the car fleet in Poland is presented.

Fuel consumption is given in kg, using the following factors for the calculation: 1 litter of gasoline = 0.755 kg, 1 litter of diesel oil = 0.84 kg, 1 litter of LPG is 0.5 kg derived from the Regulation of the Minister of Climate (Journal of Laws 2019, item . 2443). The consumption of gasoline and diesel fuel in the years 2021 and 2020 remained at a similar level. This is due to the maintenance of travel restrictions associated with the Covid-19 pandemic. In 2021, the LPG-powered car was excluded from use.

- 6) The consumption of JET A-1 aviation fuel is presented for the purchased aircraft. The aircraft has been in use since 2021.
- 7) For the calculation of the total energy consumption within the organization, the consumption of electricity, heat, natural gas and fuels (gasoline, diesel, LPG and aviation fuel) presented above was taken into account. Data calculations were made with the use of fuel calorific value indices developed by KOBIZE and the coefficients available on invoices. Total energy consumption has been converted to MJ. Total energy consumption in 2021 was 96,330,898 MJ and decreased by approx. 1.7% compared to 2020. 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 31st of December, 2021 at Comarch S.A. 5,206 employees were employed, which represents an increase in employment of 200 people compared to the same period of 2020. Energy consumption per person in 2021 was 18,504 MJ, so it decreased by approx. 5.4% compared to 2020.

Consumption of electricity, heat, gas and fuels in the Comarch Group ⁸⁾	2021	2020
Consumption of energy ⁹⁾	24,273,157 kWh	24,560,075 kWh
Consumption of heat ¹⁰⁾	20,431,759 MJ	17,545,681 MJ
Consumption of natural gas ¹¹⁾	513,742 m ³	465,673 m ³
Consumption of gasoline ¹²⁾	324,329 kg	308,241 kg
Consumption of diesel oil ¹²⁾	91,945 kg	82,387 kg
Consumption of LPG ¹³⁾	113,734 kg	519 kg
Consumption of aviation fuel ¹⁴⁾	20,527 kg	-- kg
Consumption of oil fuel ¹⁵⁾	17,435 kg	15,222 kg
Total consumption of energy ¹⁶⁾	154,025,989 MJ	142,373,969 MJ
Consumption of energy/employee ¹⁷⁾	22,910 MJ/employee	22,032 MJ/employee

- 8) The total data for buildings owned by both Comarch S.A. and companies of the Comarch Group (domestic and foreign) is presented. For Comarch S.A. these are buildings in the Special Economic Zone (SSE2, SSE3, SSE4, SSE5, SSE6, SSE7) and two buildings in Warsaw (at Puławska and Leśna Streets), excluding the building SSE1, whose area is rented by external entities. According to the Comarch Group, these are also buildings in Dresden in Germany, Lezennes in France, the iMed24 Medical Centre in Kraków and a building in Łódź at Jaracza 78 Steet. In 2021, the buildings of MKS Cracovia at Wielicka, Siedleckiego, Kałużna and Rączna Streets were added to the reporting scope. Data for 2020 have been updated accordingly.
- 9) Electricity consumption is presented for buildings owned by Comarch Group companies (domestic and foreign). In 2021, electricity consumption was lower by approx. 1.2% compared to 2020.
- 10) Heat consumption in the own buildings of Comarch Group companies in 2021 increased by approx. 16.4% compared to the base year (2020). Consumption is presented for buildings of Comarch S.A. (SSE5, SSE6

and SSE7) and for the buildings of the Comarch Group companies (Dresden in Germany, iMed24 Medical Centre in Krakow, Łódź at Jaracza 78 St., MKS Cracovia at Wielicka St., Siedleckiego St. and Kałuży St.).

11) Natural gas consumption is presented for Comarch S.A.'s own buildings (buildings in the Special Economic Zone SSE2, SSE3, SSE4) and buildings in Warsaw at Puławska St. and at Leśna St.), the remaining buildings do not have such boiler. Consumption increased by approx. 10.3% compared to 2020.

12) The consumption of gasoline and diesel is presented for:

- gasoline: total gasoline consumption for Polish and foreign companies is presented,
- diesel oil: total diesel oil consumption for Polish and foreign companies is presented.

Fuel consumption for the Comarch Group takes into account the consumption of the car fleet, low-speed equipment, machines, aggregates used for emergency power supply and the machine park of MKS Cracovia.

In 2021, the consumption of gasoline and diesel oil increased compared to 2020. In the case of gasoline, consumption increased by 5.2% compared to the base year (2020), while the consumption of diesel oil increased by 11.6%.

13) The consumption of liquefied petroleum gas (LPG) takes into account the consumption for heating the building at Rączna Street, which has been operating since 2021, and for 2020 the consumption for the needs of the Comarch S.A. fleet. (There is no LPG vehicle in the fleet from 2021).

14) The consumption of JET A-1 aviation fuel for the Comarch Group is presented for the purchased one. The aircraft has been in use since 2021.

15) The consumption of heating oil is presented for the building of MKS Cracovia at Wielicka Street. The oil is used for heating purposes. In 2021, there was an increase of 14.5% compared to the base year.

16) The total energy consumption in 2021 was 154,025,989 MJ and was by 8.2% higher than the consumption in 2020. 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 of December 31, 2021, 6,723 employees were employed in the Comarch Group companies, which is an increase in employment by 261 people compared to the same period of 2020. Energy consumption per person in 2021 was 22,910 MJ, so it increased by approx. 4.0% compared to 2020.

Responsible management of the car fleet is also conducive to reducing energy consumption.

In 2021, the successive replacement of the fleet in the companies of the Comarch Group due to complications related to the COVID19 pandemic and due to major production problems in the automotive industry was characterized by slower dynamics than in previous years. Purchases of new vehicles for reasons beyond the Comarch Group's control have been limited. 31 new cars meeting the EURO 6 standard (28 in Comarch S.A.) were purchased in Polish companies of the Comarch Group, of which 5 were hybrid vehicles, while 23 vehicles (20 in Comarch S.A.) characterized by EURO 4 and EURO 5 standards were withdrawn from use.

Despite the lower dynamics, the percentage of cars that meet the most stringent EURO 6 standard is getting higher with each subsequent year.

The following tables present the percentage of cars in Comarch S.A. and in the Comarch Group that meet the individual exhaust emission standards in 2020 - 2021.

Car exhaust emission standards at Comarch S.A.	2021	2020
EURO 6	81%	79%
EURO 5	18%	20%
EURO 4 and lower	1%	1%

In other companies of the Comarch Group, most cars also meet the EURO 6 emission standard, and despite limited purchases in 2021, their number has increased compared to less environmentally friendly vehicles (EURO 4 and EURO 5 standards). Compared to the previous year, however, it can be observed that the company acquired more new vehicles than it withdrawn from use.

Car exhaust emission standards at the Comarch Group	2021	2020
EURO 6	87%	85%
EURO 5	12%	14%
EURO 4 and lower	1%	1%

8.4. Water Consumption and Discharged Sewage

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

Activities of the Comarch Group do not involve the use of water for technological purposes. Water supplied entirely by municipal waterworks is used only in hygienic and sanitary rooms for living purposes. The Comarch Group does not collect surface water directly and does not discharge sewage into water and land.

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. However, according to the Comarch Group, the MKS Cracovia 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 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 2020 - 2021.

Water consumption in Comarch S.A.	2021	2020
Water consumption	20,802 m ³	24,655 m ³
Water consumption per 1 employee	4.00 m ³	4.93 m ³

Water consumption in the Comarch Group	2021	2020*
Water consumption	53,181 m ³	66,013 m ³
Water consumption per 1 employee	7.91 m ³	10.22 m ³

* In 2021, the buildings of MKS Cracovia at Wielicka, Siedleckiego, Kałuży and Rączna Streets were added to the reporting scope. Data for 2020 have been updated accordingly.

Water consumption is presented for buildings owned by Comarch in Poland, i.e., buildings in the Special Economic Zone (SSE2 - SSE7), and also two buildings in Warsaw (at Puławska St. and at Leśna St.).

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 Group companies in Poland and abroad. In 2021, there was a decrease in water consumption for Comarch S.A.'s own buildings, which is mainly due to the maintenance of remote work in connection with Covid-19.

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. During the estimation, a methodology was used to multiply data on energy, water and fuel consumption by appropriate emission conversion factors. These conversion factors allow the conversion of these data into carbon dioxide equivalent (CO₂e). CO₂e is a universal unit of measure that allows estimating the impact on global warming resulting from greenhouse gas emissions. Below are estimates of direct (resulting from the organization's activities) and indirect (from all other activities, e.g., electricity, water consumption) carbon dioxide emissions for the base year. The data for 2020 has been updated taking into account the data for the MKS Cracovia facilities.

The following tables present direct greenhouse gas emissions in Comarch S.A. and in the Comarch Group in 2020 - 2021.

Direct greenhouse gas emissions in Comarch S.A.	2021	2020
Emission CO ₂ e	2,013 Mg CO ₂ e	1,853 Mg CO ₂ e
Emission CO ₂ e/person	0.39 Mg CO ₂ e /person	0.37 Mg CO ₂ e /person
Emission CO ₂ e/ income unit*	0.0019 Mg CO ₂ e	0.0019 Mg CO ₂ e

Direct greenhouse gas emissions in the Comarch Group	2021	2020**
Emission CO ₂ e	2,824 Mg CO ₂ e	2,241 Mg CO ₂ e
Emission CO ₂ e/person	0.42 Mg CO ₂ e /person	0.35 Mg CO ₂ e /person
Emission CO ₂ e/ income unit*	0.0017 Mg CO ₂ e	0.0015 Mg CO ₂ e

* 1,000 PLN

** In 2021, the buildings of MKS Cracovia at Wielicka, Siedleckiego, Kałuży and Rączna Streets were added to the reporting scope. Data for 2020 have been updated accordingly.

For the calculation of direct greenhouse gas emissions, data on fuel consumption for the car fleet, low-speed equipment, machines and aggregates used for emergency power supply, machinery and aircraft (gasoline, diesel oil, LPG and aviation fuel) were used, broken down by Comarch S.A. and the Comarch Group, as well as natural gas, heating oil and LPG in installations belonging to buildings owned by Comarch S.A. / Comarch Group in Poland. Fugitive emissions of HFCs from leaks in refrigeration and air conditioning systems are also taken into account. During the calculations, indicators developed by the DEFRA organization - Greenhouse Gas Conversion Factor Repository and KOBIZE were used. Additionally, when calculating HFC emissions, data from the analysis of the database of the Central Register of Operators was used. Direct greenhouse gas emissions for Comarch S.A. in 2021 it amounted to 2,013 Mg CO₂e, which is an increase by approx. 8.6% compared to 2020. The increase in direct emissions was influenced, among others, by increasing fuel consumption for heating purposes. Direct CO₂e emissions per employee for Comarch S.A. increased by 5.4% compared to 2020 and CO₂e emissions per unit of revenue remained unchanged.

The following tables present the total greenhouse gas emissions in Comarch S.A. and in the Comarch Group in 2020 - 2021.

Total greenhouse gas emissions at Comarch S.A. (direct and indirect combined)	2021	2020
Emission CO ₂ e	13,216 Mg CO ₂ e	14,347 Mg CO ₂ e

Emission CO ₂ e/person	2.54 Mg CO ₂ e/person	2.87 Mg CO ₂ e/person
Total greenhouse gas emissions at Comarch Group (direct and indirect combined)	2021	2020**
Emission CO ₂ e	18,150 Mg CO ₂ e	18,291 Mg CO ₂ e
Emission CO ₂ e/person	2.70 Mg CO ₂ e/person	2.83 Mg CO ₂ e/person

** In 2021, the buildings of MKS Cracovia at Wielicka, Siedleckiego, Kałuży and Rączna Streets were added to the reporting scope. Data for 2020 have been updated accordingly.

To calculate the intensity of greenhouse gas emissions, the organisation's direct and indirect greenhouse gas emissions were added up. The emissions related to the consumption of electricity and the emissions related to the transport of water were taken into account as indirect emissions. For the calculation of emissions from electricity in 2021, CO₂ conversion factors from KOBIZE (National Centre for Emission Balancing and Management), RTE France (Réseau de Transport d'Electricité) and UBA (Umweltbundesamt) were used. Conversions were used to calculate the emission related to the transport of water from Defra - Greenhouse Gas Conversion Factor Repository.

Total greenhouse gas emissions for Comarch S.A. in 2021 amounted to 13,216 MgCO₂e, which is a decrease by approx. 7.9% compared to 2020. The intensity of greenhouse gas emissions was also calculated, taking into account the number of employees at Comarch S.A. According to the data as of 31st of December, 2021, 5,206 people were employed, which is an increase in employment by 200 people compared to the corresponding period of 2020. The total greenhouse gas emissions per person in 2021 amounted to 2.54 Mg CO₂e, so it decreased by approximately 11.5% compared to 2020.

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.

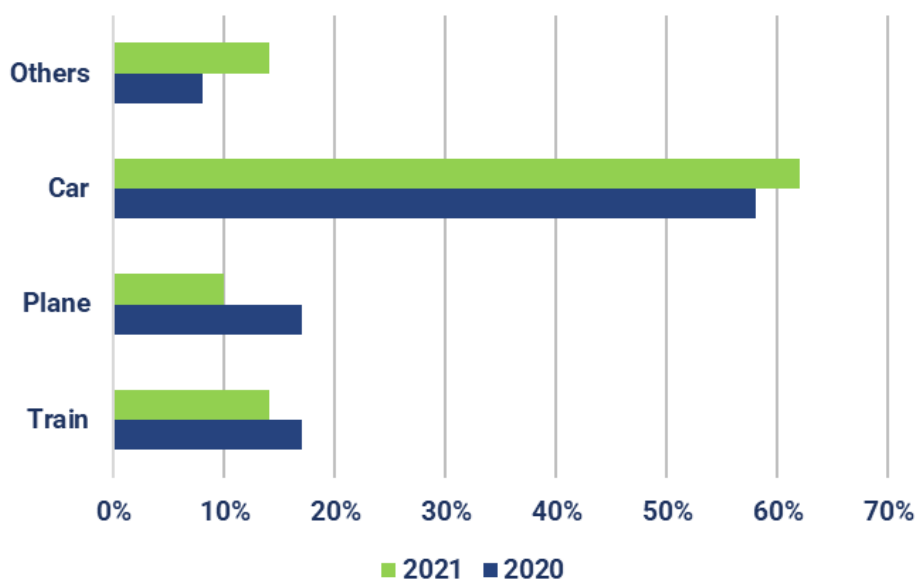
Transports organized and carried out by means of own means of transport by employees of Comarch S.A. are sporadic.

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.

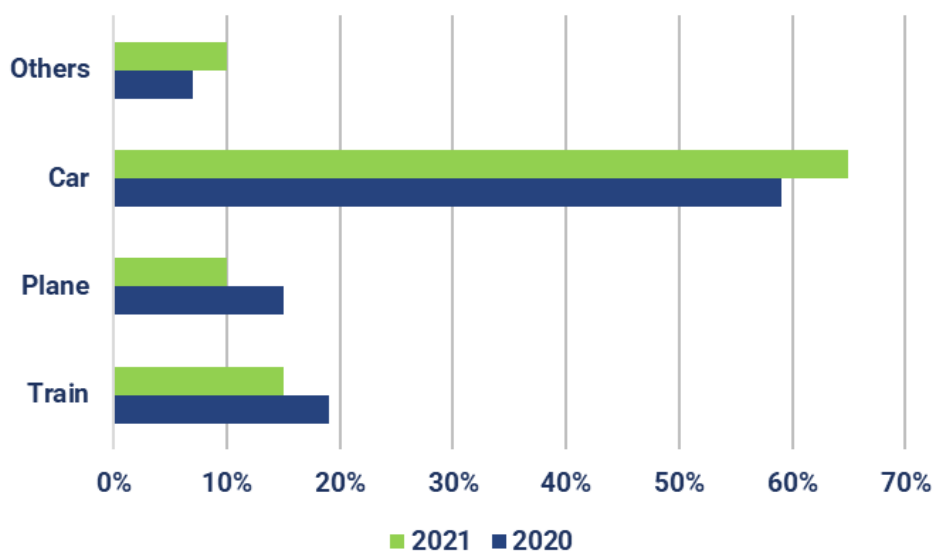
In 2020, due to the Covid-19 pandemic, the total number of delegations for the entire Comarch Group decreased by approx. 74%. In 2021, the number of delegations in the Comarch Group increased by approx. 12% compared to 2020, but was still much lower compared to 2019. The car was still the most popular means of transport, and its use once again increased its share in the total number of delegations (an increase from approx. 58% to approx. 62%). The share of other means of transport, including taxis, returned to the level from before the pandemic and amounted to about 10% 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 2020 - 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 direct greenhouse gas emissions carried out in 2021:

- 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.

In the opinion of the Comarch Group, both the Comarch Group and its suppliers do not have a direct or significant impact on climate change.

E.5.2., E.5.4.

The tables below present the emissions of nitrogen oxides, sulfur oxides and other significant air emissions at Comarch S.A. and in the Comarch Group in the years 2020 - 2021.

Comarch S.A.	2021	2020*
Emission CH ₄	2.419 Mg CH ₄	2.231 Mg CH ₄
Emission of CH ₄ /unit of income*	2.27*10 ⁻⁶ Mg CH ₄	2.23*10 ⁻⁶ Mg CH ₄
Emission of N ₂ O	4.058 Mg N ₂ O	3.129 Mg N ₂ O
Emission of N ₂ O/unit of income*	3.80*10 ⁻⁶ Mg N ₂ O	3.13*10 ⁻⁶ Mg N ₂ O
Emission of SO _x /SO ₂	0.009 Mg SO _x /SO ₂	0.010 Mg SO _x /SO ₂
Emission of SO _x /SO ₂ /unit of income*	8.07*10 ⁻⁹ Mg SO _x /SO ₂	9.87*10 ⁻⁹ Mg SO _x /SO ₂
Emission of NO _x /NO ₂	0.689 Mg NO _x /NO ₂	0.853 Mg NO _x /NO ₂
Emission of NO _x /NO ₂ /unit of income*	6.45*10 ⁻⁷ Mg NO _x /NO ₂	8.54*10 ⁻⁷ Mg NO _x /NO ₂
Emission of CO	0.412 Mg CO	0.512 Mg CO
Emission of CO/unit of income*	3.86*10 ⁻⁷ Mg CO	5.12*10 ⁻⁷ Mg CO
Emission of total suspended particles	0.007 Mg PM2.5/ PM10/ total dust	0.009 Mg PM2.5/ PM10/ total dust
Emission of total suspended particles /unit of income*	6.49*10 ⁻⁹ Mg PM2.5/ PM10/ total dust	8.59*10 ⁻⁹ Mg PM2.5/ PM10/ total dust

* Data for 2020 has been updated in line with environmental reports (Kobize).

Comarch Group	2021	2020**
Emission of CH ₄	3.161 Mg CH ₄	2.757 Mg CH ₄
Emission of CH ₄ /unit of income*	1.94*10 ⁻⁶ Mg CH ₄	1.79*10 ⁻⁶ Mg CH ₄
Emission of N ₂ O	7.438 Mg N ₂ O	5.850 Mg N ₂ O
Emission of N ₂ O/unit of income*	4.57*10 ⁻⁶ Mg N ₂ O	3.81*10 ⁻⁶ Mg N ₂ O
Emission of SO _x /SO ₂	0.072 Mg SO _x /SO ₂	0.323 Mg SO _x /SO ₂
Emission of SO _x /SO ₂ /unit of income*	4.42*10 ⁻⁸ Mg SO _x /SO ₂	2.099*10 ⁻⁷ Mg SO _x /SO ₂
Emission of NO _x /NO ₂	1.000 Mg NO _x /NO ₂	1.127 Mg NO _x /NO ₂
Emission of NO _x /NO ₂ /unit of income*	6.14*10 ⁻⁷ Mg NO _x /NO ₂	7.33*10 ⁻⁷ Mg NO _x /NO ₂
Emission of CO	0.590 Mg CO	0.629 Mg CO
Emission of CO/unit of income*	3.63*10 ⁻⁷ Mg CO	4.09*10 ⁻⁷ Mg CO
Emission of total suspended particles	0.011 Mg PM2.5/ PM10/ total dust	0.0164 Mg PM2.5/ PM10/ total dust
Emission of total suspended particles/unit of income*	6.78*10 ⁻⁹ Mg PM2.5/ PM10/ total dust	1.07*10 ⁻⁸ Mg PM2.5/ PM10/ total dust

*1,000 PLN

** In 2021, the buildings of MKS Cracovia at Wielicka, Siedleckiego, Kałuży and Rączna Streets were added to the reporting scope. Data for 2020 have been updated accordingly.

Significant air pollutants generated by organizations considered are CH₄ and N₂O from fuel combustion by the car fleet and low-speed equipment, machinery and aircraft, as well as SO_x/SO₂, NO_x/NO₂, CO, PM2,5/ PM10/ total dust from natural gas combustion, heating oil and LPG in own installations and fuels by machines and

aggregates used for emergency power supply. The calculations were based on the indicators developed by the DEFRA organization - Greenhouse Gas Conversion Factor Repository and the National Centre for Emissions Management (KOBIZE) for 2021. The data related to CH₄ and N₂O emissions were calculated using DEFRA indicators, while other emissions were calculated using KOBIZE indicators. The data given in the table are estimates.

Increase in emissions of oxides in the reporting year by Comarch S.A. and the Comarch Group results from the extension of the scope of reporting by an airplane that has been in use since 2021. Fuel consumption for the fleet and machines remained at a similar level to 2020, while an increase in fuel consumption for heating purposes was noted, which translates into increased emissions.

Local climatic conditions may affect the decrease or increase in emissions. The decrease in the ratios was also affected by the increase in revenue during the period considered. Air emissions were appropriately recorded in the "Reports for places of use of the environment" and in the "Reports on the operation of the equipment" in the National Base on Greenhouse Gas and Other Substances Emissions - KOBIZE. In addition, fees were paid for the introduction of gases and dust into the air in accordance with the applicable legal regulations.

8.6. Waste

E.6.5

The Comarch Group produces waste generated as a result of the day-to-day operations of the companies. 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 2020 - 2021. Waste electronics constitute the largest percentage of the waste stream generated by the Comarch Group - resulting from the retirement 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.

Comarch Healthcare S.A. is a producer of medical waste resulting from the conducted activity (waste code 18 01 03 * and 18 01 09). These wastes are transported and neutralized by authorized entities.

Hazardous wastes are marked in the table with the symbol "*", masses are given in megagrams.

Significant types of waste are marked in bold, the weight of the remaining waste is given jointly for the group companies. Hazardous wastes are marked in the table with the symbol "*", masses are given in megagrams (tons).

Type of waste	Code of waste	The amount of waste generated and transferred in 2021 (locations in Poland)	The amount of waste generated and transferred in 2020 (locations in Poland)
Foundry dross and slag	10 10 03	0.0210 Mg	-- Mg
Mixed packaging waste	15 01 06	0.4800 Mg	-- Mg
Packaging containing residues of or contaminated by hazardous substances	15 01 10*	0.0130 Mg	-- 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*	0.0105 Mg	-- Mg
Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12	16 02 13*	0.3650 Mg	0.3250 Mg
Discarded appliances other than those mentioned in 16 02 09 to 16 02 13	16 02 14	13.7640 Mg	7.9890 Mg
Batteries and lead accumulators	16 06 01*	3.372 Mg	-- Mg
Discarded organic chemicals containing hazardous substances (e.g., out-of-date chemicals)	16 05 08*	0.0625 Mg	-- Mg
Batteries and lead accumulators	16 06 01*	-- Mg	3.3720 Mg
Other batteries and accumulators	16 06 05	0.0500 Mg	0.0450 Mg
Medical waste (Comarch Healthcare S.A.)	18 01 03*	6.5390 Mg	4.4920 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 2021, 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 in 2021 a product fee has been paid.

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

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

E.7.3., E.7.4.

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.

Operating activities do not cause any significant environmental pollutants emitted by operating activities other than those described in the report.

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, heat pumps) 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 2021, there were no ODS emissions. On the other hand, 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 leaks were recorded in the CRO database in the cards of individual devices.

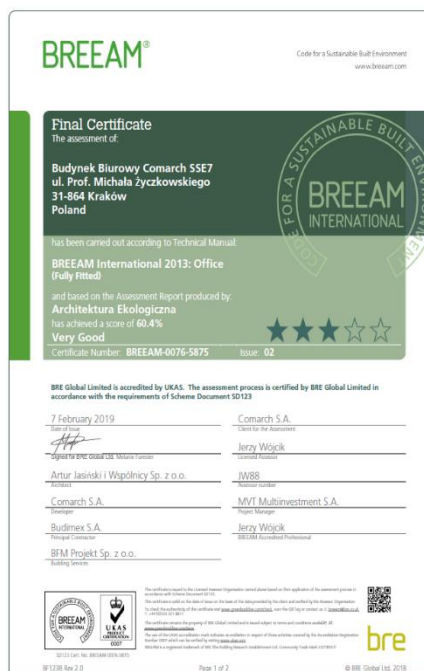
The table below presents the total emissions of ODS and F-gases in the Comarch Group in the years 2020 - 2021.

ODS and F-gas emissions	2021	2020
The Comarch Group	54.30 kg	55.00 kg

The data in the table above show emissions monitored on the basis of the CRO database for buildings owned by the Comarch Group, located in Poland.

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 seven 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. There are bins in all buildings, which enable the segregation of rubbish.

At the beginning of 2018, Comarch S.A. began operation of the modern SSE7 office building, located in the Special Economic Zone in Krakow, within the campus at prof. Michał Życzkowski in Krakow. The building has an underground garage, ground floor, 4 usable floors and a technical floor on the roof of the building. The building has been designed with care for ecology and a friendly working environment, which is confirmed by the BREEAM Very Good certificate. The building offers a number of amenities, incl. contact of all work rooms with direct daylight, the possibility of airing all office rooms through opening windows, as well as internal and external spaces for recreation and relaxation. Battery charging stations have been installed in the underground garages of the building, which enable employees to use ecological electric vehicles. The distinguishing feature is the light shelves, designed on the southern and western facades, which have a double function: on the one hand, they shade the window strip from the sun, on the other, they reflect the light, illuminating the part of the office space located at the back of the road. In this way, electricity consumption is reduced. All rooms are equipped with a separate intelligent ventilation and air conditioning system, which is also a source of heating. At night, the air-conditioning works in eco mode, and in the morning, it heats the room in advance to the temperature set on the controller. During the implementation of the Comarch SSE7 investment, care was also taken for the immediate surroundings of the building - trees and shrubs were planted.



Additionally, due to concern for the natural environment, photovoltaic cells with a total capacity of 64kWp were installed on the roof of the building. These devices are capable of producing over 40,000 kWh of electricity.



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. This water is used to care for green areas located on the company's premises.

We Are Building an Ecological Car Fleet

In 2021, almost 85% of cars met the stringent EURO 6.14% emission standards, and only 1% met EURO 4 standards. It is important to note that due to the establishment of the company in New Zealand, the company had to obtain 11 new vehicles - all vehicles were hybrid driven. The percentage of cars with ecological drives in the entire fleet structure of the Comarch Group is also constantly growing.

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.

For the sake of the natural environment, the company's canteen, which is located on the Comarch campus in Krakow, organizes the "Come with your own cup for coffee" campaign. Instead of selling hot drinks in disposable dishes, restaurant staff can serve these drinks in cups brought by guests. The initiative's main goal is to prevent over-production of garbage. 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.

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 2021 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. 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 be more environmentally friendly, while optimizing their settings so that they work as efficiently as possible. In addition, Comarch's heat sources are analysed in order to optimize their work without losing the comfort for employees. In addition, fluorescent luminaires are successively replaced with LED light sources and more modern and energy-saving devices (EnergyStar) are installed. In 2021, plans to replace communication and fire lighting with ecological LED lighting in the SSE2 building were implemented, which will reduce energy demand by 157,083 kWh per year. As a result of this investment, Comarch has become the holder of white certificates with a value of 13.506 toe.

In 2021, Comarch continued investments in renewable energy sources. As a result, another four photovoltaic installations with a total capacity of 200 kWp were installed on the roofs of SSE2, SSE3, SSE4 and SSE5 buildings located in the Special Economic Zone in Krakow. According to the plan, two additional installations with a capacity of 50 kWp each will be built in the near future, and further expansion of these installations will take place in the coming years. The energy produced in this way is used to partially cover own demand for electricity, and for the possible resale of 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 2020 - 2021.

Energy produced	2021	2020
Amount of produced energy in [kWh]	39 684	38 995

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.

Expenditure on environmental protection in the field of waste disposal, recycling and recovery of introduced products (in thousands of PLN)	2021	2020*
Comarch S.A.	13	3
Other companies of the Comarch Group	53	24

* In 2021, the buildings of MKS Cracovia at Wielicka, Siedleckiego, Kałużna and Rączna Streets were added to the reporting scope. Data for 2020 have been updated accordingly.

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 presents 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 following year, the scope of disclosures will be much wider and will ultimately be completed with an assessment of whether a given activity can be called environmentally sustainable. It will be possible to speak of an environmentally sustainable activity if the following three conditions are jointly met:

- contributes substantially to one or more of the six environmental objectives:
 - climate change mitigation,
 - climate change adaptation,
 - the sustainable use and protection of water and marine resources,
 - the transition to a circular economy,
 - pollution prevention and control,
 - the protection and restoration of biodiversity and ecosystems.
- do no significant harm to any of the six above-mentioned purposes;
- 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: managerial staff, business area experts, controlling, people responsible for the ESG area and external experts.

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 2021 from the point of view of the amount of revenue, capital expenditure or operating expenses, were not included in the indicators.

The percentage of turnover qualifying for the EU Taxonomy - Comarch S.A.

Comarch S.A.	Turnover (PLN thou.)	Trading share (%)
A. Eligible activities	1,027,618	96%
8.1. Data processing, hosting and related activities		
8.2. Computer programming, consultancy and related activities		
B. Turnover of non-eligible activities	39,830	4%
Total (A+B)	1,067,448	100%

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, the following rules were adopted:

- the percentage of turnover eligible for the EU Taxonomy was calculated by dividing
 - sums of revenues identified as qualifying for the EU Taxonomy - (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 01.01.2021-31.12.2021 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 01/01/2021 to 31/12/2021.

The percentage of turnover eligible for the EU Taxonomy - Comarch Group

Comarch Group	Turnover (PLN thou.)	Trading share [%]
A. Eligible activities	1,512,475	93%
8.1. Data processing, hosting and related activities		
8.2. Computer programming, consultancy and related activities		
B. Non-eligible activities	114,674	7%
Total (A+B)	1,627,149	100%

The percentage of capital expenditures (CAPEX) eligible for the EU Taxonomy - Comarch S.A.

Comarch S.A.	CapEx (PLN thou.)	CapEx share (%)
A. Eligible activities	47,787	100%
8.1. Data processing, hosting and related activities		
8.2. Computer programming, consultancy and related activities		
B. Non-eligible activities	-	-
Total (A+B)	47,787	100%

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, the following rules were adopted:

- the percentage of capital expenditure (CapEx) eligible for the EU Taxonomy was calculated by dividing
 - sums of investment outlays identified as eligible for the systematics of the EU Taxonomy by, respectively,
 - the sum of investment expenditure included in the financial statements of Comarch S.A. for the period from 01/01/2021 to 31/12/2021, 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 01/01/2021 to 31/12/2021, 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).

The percentage of capital expenditures (CAPEX) eligible for the EU Taxonomy - Comarch Group

Comarch Group	CapEx (PLN thou.)	CapEx share (%)
A. Eligible activities	101,041	71%
8.1. Data processing, hosting and related activities		
8.2. Computer programming, consultancy and related activities		
B. Non-eligible activities	41,112	29%
Total (A+B)	142,153	100%

The percentage of operating expenses (OPEX) eligible for the EU Taxonomy - Comarch S.A.

Comarch S.A.	OpEx (PLN thou.)	OpEx share (%)
A. Eligible activities	39,163	94%
8.1. Data processing, hosting and related activities		
8.2. Computer programming, consultancy and related activities		
B. Non-eligible activities	2,404	6%
Total (A+B)	41,567	100%

The percentage of operating expenses (OPEX) eligible for the EU Taxonomy - Comarch Group

Comarch Group	OpEx (PLN thou.)	OpEx share (%)
A. Eligible activities	45,221	82%
8.1. Data processing, hosting and related activities		
8.2. Computer programming, consultancy and related activities		
B. Non-eligible activities	10,213	18%
Total (A+B)	55,434	100%

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

- the percentage of operational expenditure (OpEx) eligible for the EU Taxonomy is calculated by dividing,
 - the sum of operational expenditure identified as eligible for the EU Taxonomy 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.

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/ <u>low</u>	G.1.1., G.1.2.
	Governance	High/medium/ <u>low</u>	G.2.1., G.2.2., G.2.3.
	Social and environmental risk management	High/medium/ <u>low</u>	G.3.1., G.3.2.
	Ethics management	High/ <u>medium</u> /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/ <u>medium</u> /low	E.1.1., E.1.2.
	Direct and indirect impact: fuel and energy	High/ <u>medium</u> /low	E.2.1., E.2.2., E.2.3.
	Direct and indirect impact: water	High/ <u>medium</u> /low	E.3.1., E.3.2., E.3.3.
	Direct and indirect impact: biodiversity	High/medium/ <u>low</u>	E.4.1., E.4.2., E.4.3., E.4.4.
	Direct and indirect impacts: emissions to the atmosphere	High/ <u>medium</u> /low	E.5.1., E.5.2., E.5.3., E.5.4.
	Direct and indirect impact: waste and sewage	High/ <u>medium</u> /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/ <u>medium</u> /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/ <u>medium</u> /low	E.8.1., E.8.2., E.8.3.
Social and employee	Use of public aid and public orders	High/medium/ <u>low</u>	S.1.1., S.1.2.
	Employment level and remuneration level	High/ <u>medium</u> /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/ <u>medium</u> /low	S.3.1., S.3.2., S.3.3., S.3.4., S.3.5., S.3.6.
	Occupational Health and Safety	<u>High</u> /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/ <u>medium</u> /low	S.5.1., S.5.2.
	Diversity management	High/ <u>medium</u> /low	S.6.1., S.6.2., S.6.3., S.6.4.
	Human rights	<u>High</u> /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/ <u>medium</u> /low	S.8.1., S.8.2., S.8.3., S.8.4.
	Local communities and social involvement	High/ <u>medium</u> /low	S.9.1., S.9.2., S.9.3., S.9.4., S.9.5., S.9.6.
	Counteracting corruption	High/ <u>medium</u> /low	S.10.1., S.10.2., S.10.3.
Safety of products and consumers	High/ <u>medium</u> /low	S.11.1., S.11.2., S.11.3.	
Child Labour	High/medium/ <u>low</u>	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/>)