

# COMARCH



## **Comarch S.A. and Comarch Group Consolidated Non- Financial Data Statement for 2023**

Kraków, 26<sup>th</sup> of April, 2024

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More than **70** countries on **6** continents  
– we implement projects all over the world



**PLN 1,816 million**  
of sales revenue



**PLN 101 million**  
of net profit attributable to the parent Company's  
shareholders



**> PLN 1.6 billion**  
capitalization of Comarch S.A. on the Warsaw  
Stock Exchange  
(the 31<sup>st</sup> of December, 2023)



**5.3%**  
EBIT margin



**6,400+**  
professionals employed

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

Dear Shareholders,

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

Regardless of the formal requirements, Comarch has been using good practices in the field of non-financial reporting for many years. This results both from the internal need to communicate with shareholders, as well as compliance with the Corporate Governance Principles for listed companies and the provisions of the Accounting Act.

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

The key events related to sustainable development and non-financial reporting, recorded in the reporting period, were continuous improvement of management quality, increased role of "soft" incentives, increased promotion of physical and cultural activity among employees, increasing awareness of diversity among management and employees, as well as improving suppliers' management procedures. The Comarch Group constantly conducts activities to protect the natural environment, invests in its own renewable energy sources and promoting pro-ecological attitudes among the crew. Last year, the Comarch Group was actively involved in helping refugees from Ukraine and was invariably a patron of culture, art and sport, supporting local initiatives, local government and non-governmental organizations, health care units and charity campaigns.

In 2023, the company faced a number of external challenges, similar to those experienced in previous years. These included the war in Ukraine, geopolitical tensions worldwide, significant currency and energy price volatility, high inflation, and rising labour costs. Unfortunately, over the past year, there were also tragic internal events, including the death of the long-standing Chairman of the Board and one of the main shareholders of Comarch S.A., Professor Janusz Filipiak, and the death of the long-standing Vice President of Comarch S.A., Mr. Paweł Prokop. Despite these challenging circumstances, the Comarch Group has continued to develop its activities throughout 2023, achieving impressive financial results. This demonstrates the Group's resilience and ability to operate effectively in any market conditions. The Comarch Group is well-positioned to fulfil its mission of spreading innovative technical ideas created in Poland around the world. Its strong financial position, product, industry, and geographic diversification, ability to adapt to rapidly changing environments, and the commitment of its employees enable it to meet this goal.

The Management Board of Comarch S.A. points that the Non-Financial Information Statement includes non-financial information regarding Comarch S.A. and the Comarch Capital Group. The statement was prepared in accordance with the requirements of non-financial reporting included in the Accounting Act of 29th September, 1994, European Commission guidelines on Directive 2014/95/EU on reporting on non-financial information and on the basis of the National Non-Financial Information Standards (SIN) issued by the Reporting Standards Foundation. The disclosure of KPI data was also made in line with Regulation (EU) 2020/852 of the European Parliament and of the Council of the 18th of June, 2020 on the establishment of a framework to facilitate sustainable investment (EU Taxonomy). This report includes data for 2023 and comparative data for 2022. 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

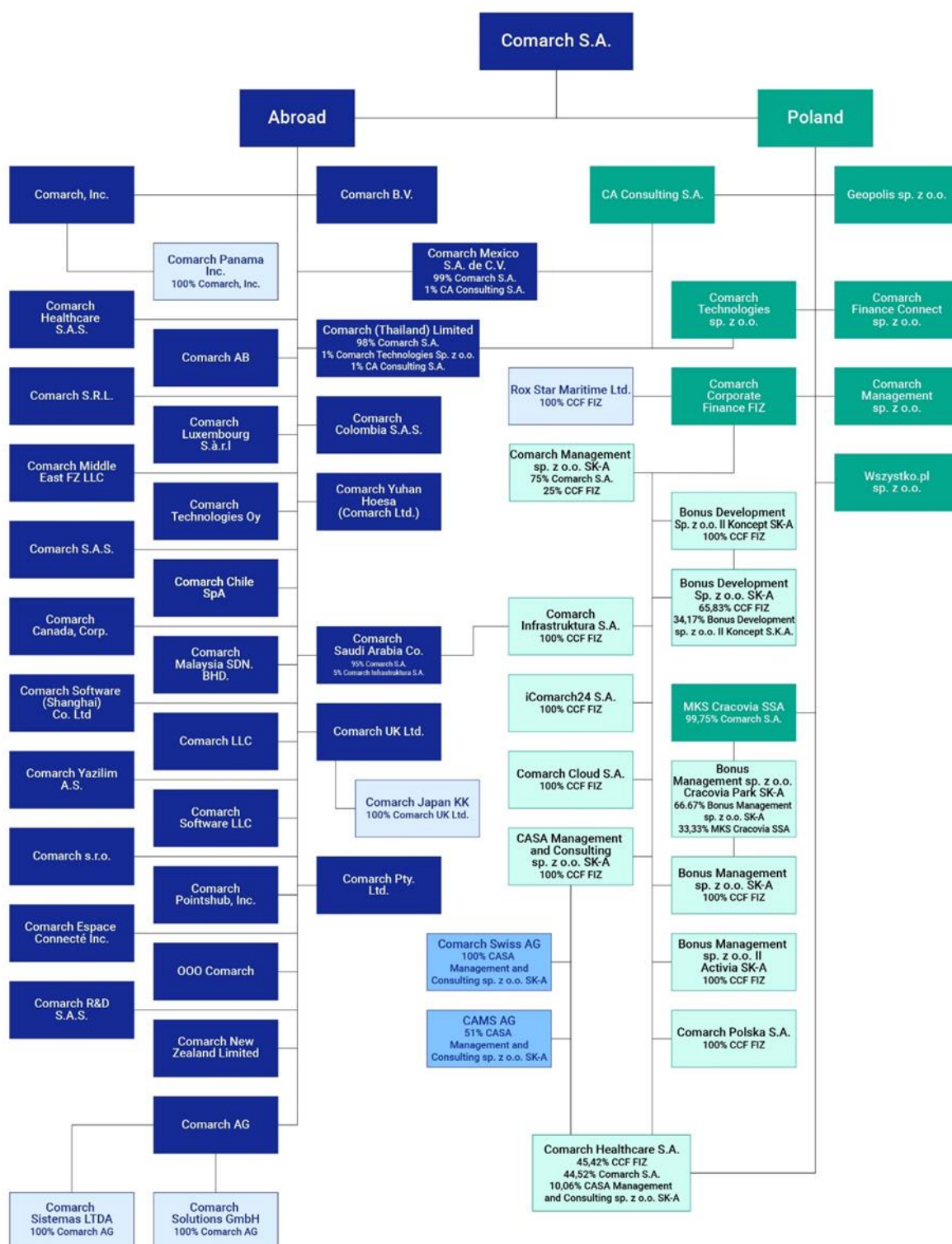
### 2.1. Structure, Shareholders and Activities of the Company

#### Structure of Comarch Group

##### G.1.1., G.1.2.

The Consolidated Financial Statement of the Comarch Group for 12 months of 2023 includes the statements of the following companies. This Non-Financial Information Statement covers all entities of the Comarch Capital Group included in the Consolidated Financial Statement. The structure of the Comarch Group is presented below.





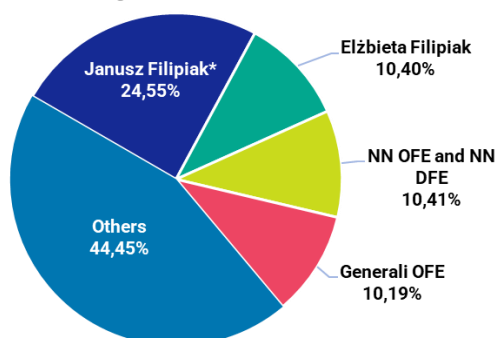
100% Comarch S.A., unless otherwise indicated.

## Shareholders and Activities of the Company

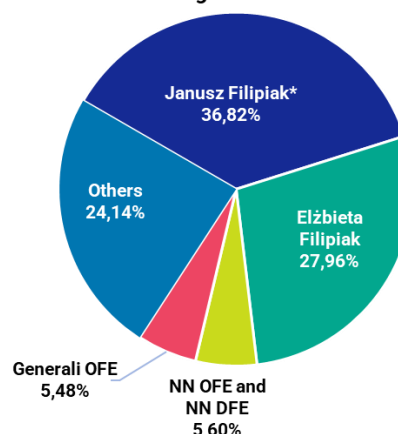
The basic activities of the Comarch Group, in which Comarch S.A. with its registered office in Krakow at Al. Jana Pawła II 39 A is a Parent Company, include activity related to software, PKD 62.01.Z. The registration court for Comarch S.A. is the District Court for Krakow Śródmieście in Krakow, The Eleventh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

The charts below show shareholders owning directly or indirectly through subsidiaries at least 5% of the total number of votes at the General Meeting of Comarch S.A., as at 26<sup>th</sup> of April, 2024.

Shareholding- number of shares



Shareholding- number of votes



\*) On 17th of December, 2023, the Management Board of Comarch S.A. - through current report No. RB-19-2023 (ENG: RB-19-2023) - announced the death of the President of the Management Board of Comarch S.A., Professor Janusz Filipiak. As a result, Professor Janusz Filipiak's term on the Management Board of Comarch S.A. expired on the 17th of December, 2023. Mr. Professor Janusz Filipiak was a co-founder of Comarch S.A., one of its main shareholders, and a long-standing President of the Company's Management Board.

\*) on the basis of data published by open pension funds and investment funds as at 29.02.2024.



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 the development of IT solutions in a service model - Comarch is one of the market leaders in this area. The Comarch Group offers a comprehensive range of services in the field of cloud computing with Comarch Cloud, which meets the highest security standards and is built on the infrastructure of Comarch Data Center. Thanks to Comarch Cloud, customers can use software, data storage, and run their businesses without the need for their own IT infrastructure, while ensuring high performance, reliability, security, and scalability.

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.

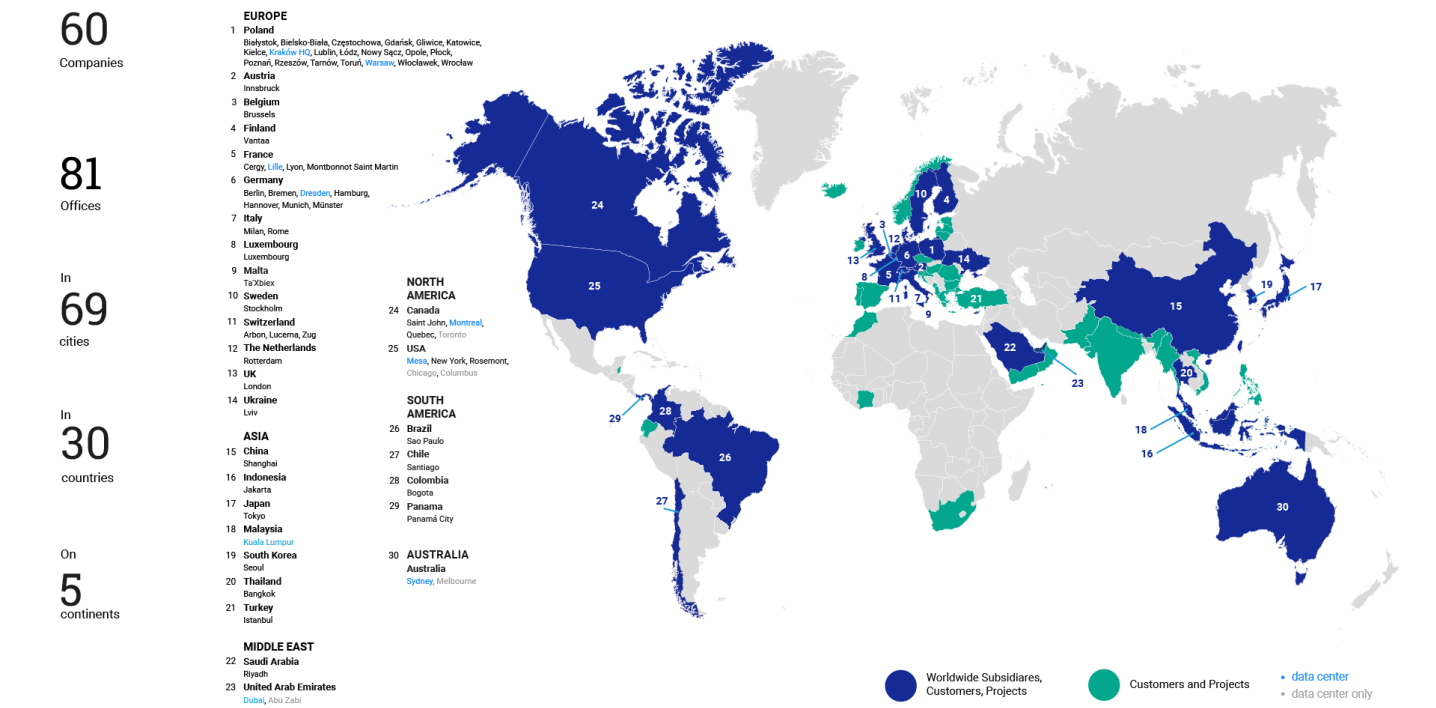
When planning its development strategy, Comarch takes into account social and environmental aspects consciously limiting the impact of its operations on the natural environment, minimizing the consumption of natural resources and limiting the generation of waste generated as a result of the current activity.

As at the date of publication of the statement, Comarch S.A. has 20 locations, including branches in Poland, the Comarch Group consists of 59 companies located on 6 continents, in 32 countries, in over 71 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 and North America. In the previous year, Comarch Peru S.A.C. en liquidación was liquidated and Comarch KPPA, the representative office of Comarch S.A. in Indonesia, was registered. On 4<sup>th</sup> of October, 2023, amendments to the articles of association of Comarch Software und Beratung AG were passed, which changed the name of this entity to Comarch Aktiengesellschaft (Comarch AG). In 2023, Comarch S.A. also entered into an agreement for the acquisition of shares in Miejski Klub Sportowy Cracovia Sportowa Spółka Akcyjna with its registered office in Kraków, ul. Józefa Kałuży 1 ('MKS Cracovia SSA'). Further capital investments are planned in 2024, both in the domestic and foreign markets. Further information on organisational changes can be found in section 1 of the Consolidated Financial Statements for 2023.



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



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



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

In 2023, Comarch Inc. has commissioned 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 a server room in the US has significantly improved the diversification of Comarch's ICT infrastructure and allows it to benefit from lower electricity prices than in Europe.

Other basic information about Comarch S.A. and the Comarch Group were published respectively in point 1 of the

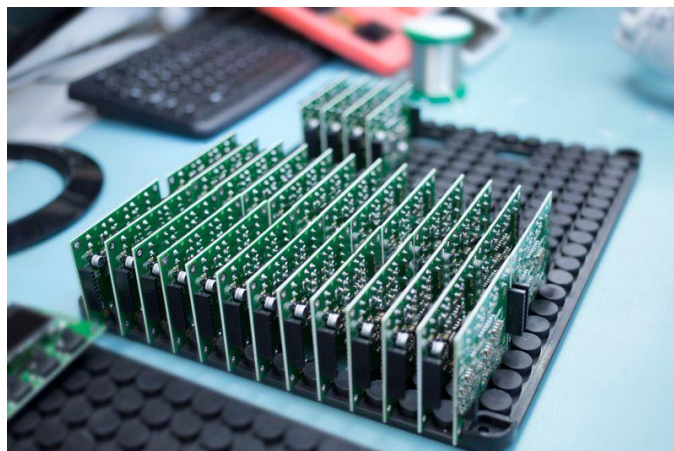
Statement of Comarch S.A.'s Management Board regarding the activities and Statement of Comarch S.A.'s Management Board regarding the activities of the Capital Group.

## 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 2023 reached PLN 411.9 million and thus exceeded 22.7% of Comarch Group's sales revenues. The Comarch Group allocated own resources to them. Expenses for research and development in Comarch S.A. in 2023 reached PLN 399.9 million, which accounts for 30.5% of the Company's sales revenue.

### Activities in the Special Economic Zone

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

A detailed description of the investment allowances held for operating in the Special Economic Zones has been published in note 3.11 of the Consolidated Financial Statements of the Comarch Group for 2023.

#### S.1.2.

The table below presents sales to customers from the public sector in 2022 – 2023.

in thousands of PLN	2023	%	2022	%
<b>Revenue Comarch S.A.</b>	<b>1,312,273</b>	<b>100.0%</b>	<b>1,210,626</b>	<b>100.0%</b>
<i>including public sector</i>	14,244	1.1%	11,593	1.0%
<b>Revenue Comarch Group</b>	<b>1,815,839</b>	<b>100.0%</b>	<b>1,858,715</b>	<b>100.0%</b>
<i>including public sector</i>	155,232	8.6%	159,979	8.6%

In 2023, the Comarch S.A.'s revenue from sales to the public sector clients increased by 22.9%, i.e., by PLN 2,651 thousand, compared to 2022. Regarding Comarch Group's revenue from sales to public sector, they decreased by 3%, i.e., PLN 4,747 thousand. The public sector was responsible for 8.6% of revenue of the Comarch Group in the discussed period.

## Number of subsidies received in particular years

The table below presents the number of subsidies received by Comarch S.A. and the Comarch Group in 2022 – 2023.

in thousands of PLN	2023	2022
<b>Comarch S.A.</b>		
Horizon 2020 (European Commission)	-	8
Structural Funds POIR (Operational Program Innovative Development)	-264	404
National funds	-	-
De minimis aid	-	-
<b>Total</b>	<b>-264</b>	<b>412</b>
<b>Grupa Comarch</b>		
Horizon 2020 (European Commission)	-	8
Structural Funds POIR (Operational Program Innovative Development)	- 264	404
National funds	83	-
De minimis aid	395	200
Lesser Poland Regional Operational Programme (Structural Funds)	152	209
<b>Total</b>	<b>366</b>	<b>821</b>

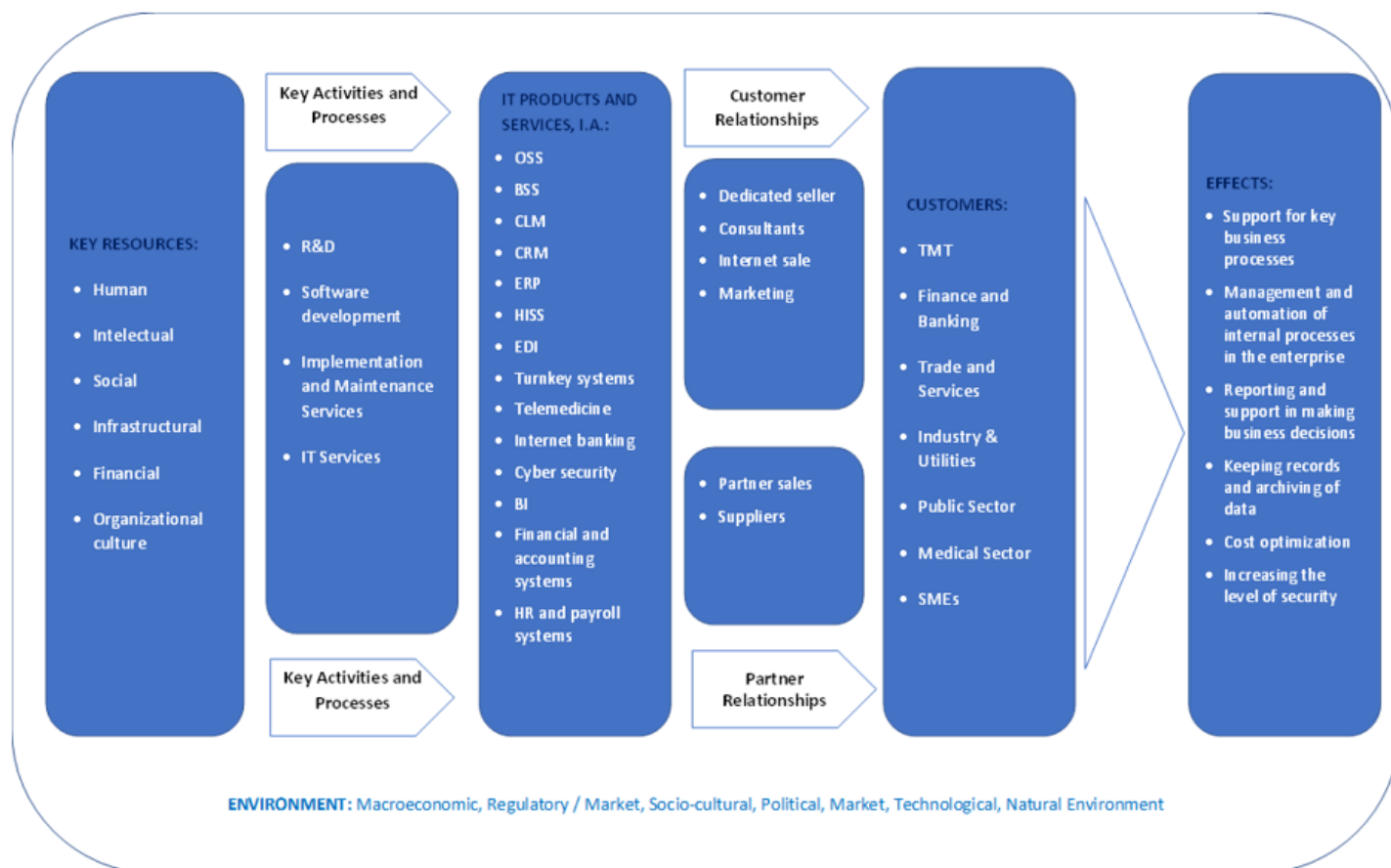
## 2.3. Organizational Culture and Business Model

For over 30 years, Comarch has been consistently building an organizational culture and value system, that includes, among others:

- 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 customers,
- engaging in mutually beneficial cooperation with our suppliers to improve the quality and offered products and services,
- a high level of care with regard to the confidentiality and security of the information and data processed,
- 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 health and safety,
- shaping quality, environmental, energy, health and safety awareness and information security among employees,
- 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 performance and reduce the carbon footprint associated with the company's operations,
- obeying applicable legal requirements and other,
- continuous improvement of the effectiveness of the Integrated Management System, including AQAP 2110 and AQAP 2210,
- supporting activities related to sustainable development and corporate social responsibility.

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

### COMARCH BUSINESS MODEL



## 2.4. ESG strategy - assumptions and goals

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

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



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

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

## 2.5. Key Non-Financial and Financial Performance Indicators

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

As at 31st of December, 2023, Comarch S. A. employed 5,118 persons compared to 5,469 persons employed as at 31st of December, 2022, while in the entire Capital Group the number of employees decreased to 6,479 persons compared to 6,871 persons as at 31st of December, 2022.

The tables below present the average number of people employed at Comarch S.A. and in the Comarch Group in 2019 – 2023.

Average number of employees in Comarch S.A.	2023	2022	2021	2020	2019
Employment agreement	4,437	4,585	4,327	4,117	4,057
Other form of employment	681	883	887	925	930
<b>Total</b>	<b>5,118</b>	<b>5,468</b>	<b>5,214</b>	<b>5,042</b>	<b>4,987</b>

Na dzień 31 grudnia 2023 r. w Comarch S.A. 2 847 pracowników było zatrudnionych w Krakowie, natomiast 2 271 w innych miastach w Polsce.

Average number of employees in Comarch Group	2023	2022	2021	2020	2019
Employment agreement	5,349	5,547	5,427	5,119	5,087
Other form of employment	1,167	1,373	1,360	1,383	1,361
<b>Total</b>	<b>6,516</b>	<b>6,920</b>	<b>6,787</b>	<b>6,502</b>	<b>6,448</b>

As at 31<sup>st</sup> of December, 2023, in the Group 3,396 employees were employed in Krakow, 2,460 in other cities in Poland.

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

The activities of the Comarch Group do not have a significant impact on the natural environment, but we are not indifferent to its state. 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 CO<sub>2</sub> emissions in Comarch S.A. and in the Comarch Group in 2022 – 2023.

Electricity, heat, gas and water consumption and overall CO <sub>2</sub> e emissions of Comarch S.A.	2023	2022
Electricity consumption	16,061,782 kWh	16,474,942 kWh
Heat consumption	6,274,200 MJ	6,069,710 MJ
Gas consumption	404,742 m <sup>3</sup>	435,003 m <sup>3</sup>
Water consumption	31,178 m <sup>3</sup>	30,888 m <sup>3</sup>
Overall emission of CO <sub>2</sub> e (Scope 1 and Scope 2)	14,682 Mg CO <sub>2</sub> e	14,434 Mg CO <sub>2</sub> e

Electricity, heat, gas and water consumption and overall CO <sub>2</sub> e emissions of Comarch Group	2023	2022
Electricity consumption	23,452,512 kWh	23,594,298 kWh
Heat consumption	18,379,000 MJ	17,943,880 MJ
Gas consumption	404,742 m <sup>3</sup>	435,003 m <sup>3</sup>
Water consumption	71,081 m <sup>3</sup>	81,673 m <sup>3</sup>
Overall emission of CO <sub>2</sub> e (Scope 1 and Scope 2)	18,827 Mg CO <sub>2</sub> e	19,163 Mg CO <sub>2</sub> e

To report greenhouse gas emissions for 2023 and comparative data, the methodology compliant with the GHG Protocol Corporate Accounting and Reporting Standard was used. In the Scope 1 and Scope 2, an increase in carbon dioxide equivalent emissions is observed compared to 2022 - in the case of Comarch S.A. by 1.7%, and in the case of the Capital Group decreased by 1.8%, which is in line with the target set in the ESG strategy for CO<sub>2</sub> emissions.

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

## 2.6. Membership in International Organizations

### International organisations

Comarch is a member of **IT organizations**, such as ETIS and TM Forum, so that it has constant access to the latest standards emerging in this area (e.g. standards ODA - Open Digital Framework). At Comarch, the use of modern technology is understood not only as a means of implementing projects, but also as the application of available standards to the maximum extent possible.

The TeleManagement Forum (TMF) is a non-profit organization that was founded in 1988 to accelerate the development of telecommunications network management systems. On the other hand, ETIS is an international organization aimed at exchanging information on the most important technological issues between telecommunications service providers in Europe. The mission of ETIS is to support members in increasing their business efficiency by exchanging information on the effective use of computer technologies.

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.

In December 2023, Comarch became a member of the 450 MHz Alliance, a global organisation that brings together operators, band owners, equipment, terminal and solution providers to drive the development of mobile networks in the 450 MHz frequency band worldwide.

Comarch is also a member of international chambers of commerce and industry, including the Polish-German Chamber of Commerce and Industry, the French-Polish Chamber of Commerce, the Polish Chamber of Commerce and Industry in France, the British-Polish Chamber of Commerce, as well as industrial organisations around the world.

In Spain, Comarch is a member of AECOC, the Spanish representative of the global organisation GS1.

Since 2015, Comarch has also been operating in Italy. It belongs to the association of companies operating in the metropolitan area of Milan and the provinces of Lodi, Monza and Brianza in Pavia - Assolombarda. This organisation brings together national and international companies of various sizes, producers of goods and services in all product sectors. The role of the association is to support its members in their contacts with local companies and institutions.

Comarch is also a member of the Osservatorio Sanita' Digitale and the Osservatorio Digital B2B (e-invoicing) of the Politecnico di Milano.

In the Benelux countries, Comarch is a member of the Belgian-Polish-Luxembourg Chamber of Commerce. The Chamber's mission is to promote Belgian and Luxembourg investments and exports to Poland, as well as to support Polish companies in cooperation with Belgian and Luxembourg companies. A member of the BEPOLUX Board is Wojciech Pawluś, Comarch's Managing Director for the Benelux countries, Vice-President of the Comarch Board.

In France, Comarch is a member of the HUB-RETAIL "Cross-Canal and Omni-Logistics" association. The aim of this organisation is to unite and collaborate with the business community in the Auvergne-Rhône-Alpes region and the related logistics sector in order to strengthen the industry and create relationships and synergies between the various entities, in particular between start-ups and large customers with a high level of business activity and job creation. The company is also a member of the Adira organisation, which brings together regional players in the field of information technology.

In France, Comarch is also a member of the AD2N regional association, which brings together more than 40 digital services companies (ESN) and IT systems manufacturers. It also operates within the structures of Syntec Numérique, a professional organisation that brings together digital services companies (ESN), software publishers and technology (ICT) consulting companies. Comarch is also an active member of the Cité de l'IA - an association that promotes knowledge of artificial intelligence. It is also a member of the FNFE.

The association in which Comarch participates is Loyalty360. The organisation operates on the market of marketing solutions in the field of customer loyalty and its goal is to encourage dialogue between industry leaders and to provide resources that enable building brands in the field of loyalty,

Comarch is also a member of financial organisations and associations.

Since 2023, Comarch has been a member of the Mobey Forum, a global non-profit industry association that enables banks and other financial institutions to shape the future of digital financial services. The association connects banking professionals around the world.

Also in 2023, the company joined the International Trade and Forfeiting Association (ITFA). It brings together companies, financial institutions and intermediaries involved in global trade, forfeiting, supply chain and receivables financing. ITFA has around 320 members from over 50 different countries.

## National organisations

In Poland, Comarch is a partner of the Banking Technology Forum of the Association of Polish Banks, a platform connecting the technology and banking sectors that has been operating for 20 years. The current forum brings together the largest technology providers and, thanks to cooperation with bank representatives, offers the opportunity to create new joint initiatives and provides information on innovative technological solutions in banking and e-business. The Forum also devotes a great deal of attention to combating crime in electronic banking. Not only modern anti-crime technologies are promoted, but also best user practices.

Comarch is also a partner supporting the Polish Factors Association, which has been operating since 2001. At present, PZF has 29 members. The main task of the Polish Factors Association is to raise awareness of the benefits of factoring among entrepreneurs. The Association also conducts an extensive dialogue for the development of this sector in Poland, as well as educating entrepreneurs and cooperating with academic centres and decision-makers for the development of the market.

Since 2021, Comarch has been cooperating with the National Association of Hospitals (PFSz), and since 2022 it has been its supporting member. PFSz is a nationwide employer organisation that unites hospitals regardless of their ownership structure, size, specialist profile, location or operating model. PFSz directly unites more than 250 hospitals, and through indirect membership or agreements with local and sectoral hospital associations, it acts as an umbrella organisation for a total of more than 500 hospitals. Another advantage of the PFSz is a large group of supporting members: important national and international companies, healthcare system experts and PFSz ambassadors. In addition, Comarch is a member of the National Association of Private Hospitals - established in 2002 to represent the interests of its members, solve regulatory and administrative problems, offer educational projects and management tools for the private hospital sector and healthcare providers.

Comarch supports the National Chamber of Nursing Homes, which is the first initiative in Poland aimed at the broad integration of the institutional elderly care environment in Poland. Its main goal is to provide holistic support to care institutions throughout the country, regardless of their operating formula.

Comarch is also a partner of the "Employer for Health", which is part of the Lewiatan Confederation, a representative organisation of employers that has a legal guarantee of participation in the legislative process and is a member of the Social Dialogue Council. This organisation takes initiatives to influence the development of legislation relating to the interests of employers. Our aim is to comment on draft legislation and implementing regulations. As part of our work, we also cooperate with other organisations, conduct research, organise training and share information that is important from an employer's point of view. Our aim is to support changes in the Polish health care market so that it becomes more effective, of higher quality and focused on patients and their needs.

### Awards and rankings in 2023

- Report „Computerworld TOP200” – Comarch S.A. Comarch S.A. took the first place in the following categories:
  - The largest providers of IT solutions and services for the telecommunications sector,
  - The largest providers of Enterprise Resource Planning (ERP) systems
  - The largest provider of RPA systems and business process automation in 2022.
- Report IDC „Poland Enterprise Application Software Market Analysis and 2022 Vendor Shares” – The company ranked second among suppliers of ERP systems and first among Polish manufacturers.
- Competition Prize "Zdrowa Przyszłość – Inspiracje" - Comarch Healthcare received a prestigious award in the category "Innovative solutions, products and services that improve the quality of life, health and access to services" for the project "ZdroWiem – an innovative tool for health prevention". The project took 3rd place.
- The "IT in Administration" Product of the Year plebiscite - the Comarch e-Urząd platform took 2nd place in the category: Software for Public Administration.



- Telecom Review Excellence Awards 2023 – Comarch S.A. won an award in the "Best Smart Infrastructure Management/Solution" category for its mobile OSS application.
- Award at the CEE23 SME Banking Conference organised by the SME Banking Club at the ICE in Krakow - the Comarch Open Platform solution was awarded in the "Best ecosystem software for SMEs" category."
- Banking Tech Awards 2023 in London - Comarch received an award in the category "Best BankingTech - Digital Engagement solutions provider".
- Report „ITwiz Best 100” – Comarch S.A. Comarch S.A. took first place in the following categories:
  - for the sale of ERP systems,
  - for sales to the telecom sector,
  - for sales to the trade sector.

### Comarch in the reports of analytical companies

- Comarch was included in the Gartner® Market Guide for CSP Service Design and Orchestration Solutions report, where it was listed among 15 suppliers offering a diverse range of solutions, with varying approaches to implementation and a focus on multiple areas, including telecommunications for entrepreneurs in various segments. Furthermore, Comarch was included in the Gartner Market Guide for CSP Customer Management and Experience Solutions report prepared by Juha Korhonen, Amresh Nandan, Chris Meering and Susan Welsh de Grimaldo, where it was noted in the Gartner publication among 19 other vendors that "represent a wide range of solutions, offering different product portfolios, implementation/implementation approaches and areas of focus for the most diverse CSP-related segments."

The Comarch Open Platform product was highlighted in the Turbiny Polskiej Gospodarki report published by "Gazeta Finansowa".

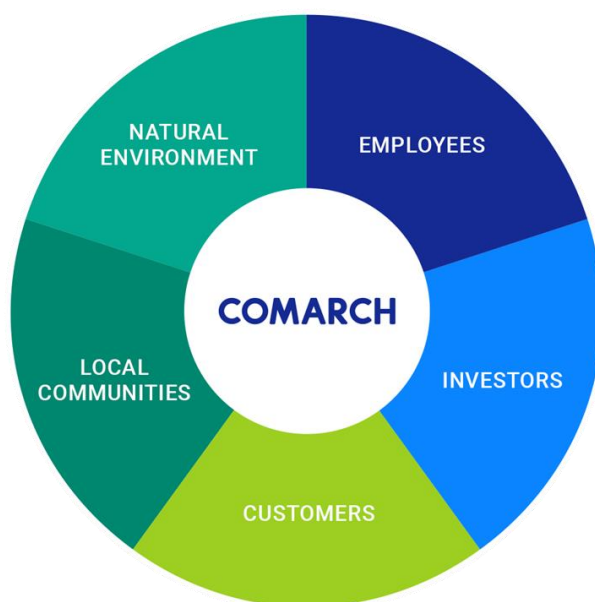
## 3. Stakeholder Engagement

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

The project is a unique undertaking - it not only allows the exchange of knowledge as a traditional forum, but also gives Customers the opportunity to influence the development of products that they use on a daily basis. It is also appreciated by entrepreneurs looking for software for which the platform is open. At the stage of choosing a company management system, they can contact Comarch system users, ask questions, clarify doubts, and read all discussions.

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

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

On the main page of the platform, you can follow the current statistics, which at the end of March 2024 are as follows:

- 16,836 questions asked,

- 43,654 answers,
- 16,629 comments,
- 3,476 ideas for new functionalities and improvement of existing ones, over 370 of which have been implemented by Comarch.

Welcome to [www.Spolecznosc.Comarch.pl](http://www.Spolecznosc.Comarch.pl)

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

### 4.1. Integrated Management System

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

#### G.2.2.

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

- Certificate of Integrated Management System compliant with the requirements of PN-EN ISO 9001:2015-10 Quality Management Systems, PN-EN ISO 14001:2015-09 Environmental Management Systems, PN-ISO 45001:2018-06 Occupational Safety and Health Management Systems, PN-EN ISO/IEC 27001:2017-06 Information Security Management Systems,
- Certificate of Energy Management System compliant with the requirements of PN-EN ISO 50001:2018-09 Energy Management Systems,
- Certificate of the Internal Control System, which meets the requirements of Article 11(2) the Act of 29th of November, 2000 on foreign trade in goods, technologies and services of strategic importance for national security, as well as for maintaining international peace and security (as amended),
- Certificates which confirm that the Quality Management System meets the requirements of AQAP 2110: 2016- NATO requirements for quality assurance in design, development and production as well as AQAP 2210: 2015- NATO supplementary requirements for AQAP 2110 regarding software quality assurance.

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

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

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

The Integrated Management System ensures proper, systemically administered implementation of all business processes affecting the quality of products and services. The proper functioning of the system guarantees that all processes are monitored in terms of effectiveness and efficiency, improved and adapted to the constantly changing market and technological conditions as well as to the changing customer requirements. High quality of products and services is supported by constant care for the environment and for the safety of employees and suppliers. Applying the principles of systems implemented in Comarch contributes to the increase of trust between the company and customers and suppliers. It also strengthens the image of Comarch in the eyes of all entities interested in the effects of our company's activities in the areas of quality of offered products and services, environmental impact, energy management, ensuring occupational safety and health, as well as



ensuring information and data security and control in technologies and services of strategic importance to state security.

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

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

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

### G.2.3.

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

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

### G.3.1., G.3.2.

Each of the subsystems included in the Integrated Management System Comarch covers its scope with a different subject matter and is characterized by specific risks. The Quality Management System puts a special emphasis on the risks associated with the overall functioning of the organization and its processes, documentation and relations with Suppliers. Environmental and OHS management take into account risks related to employee issues and impact on the environment. The Export Control System Policy regulates the issues of international trade in goods and technologies and ensures compliance of processes with specific legal requirements. The AQAP system, concerning the implementation of projects for the armed forces, contains restrictive requirements and is built on risk management as part of ongoing projects. An opportunity for the organization is to start cooperation with new clients, establish new business relations.

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

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

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

- Risk related to the deterioration of the quality of products and services offered, failure to meet customers' quality expectations,
- Risk related to the occurrence of non-compliance and instability in internal processes,

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

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

#### G.2.1., G.3.1.

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

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 2023 was 142. 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 2023, 41 non-compliances, 169 strengths and 69 potentials for improvement were identified.

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

### **Information Security Management System and Security Policy**

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

Information and information processing systems constitute critical and extremely important goodwill, which is why Comarch places great emphasis on protecting data and own and customers assets. A comprehensive information protection system based on the PN-ISO/IEC 27001:2017-06 and PN-EN ISO/IEC 27002:2017-06 standards was implemented. The system is certified for compliance with the PN-EN ISO/IEC 27001:2017-06 standard by the Polish Center for Testing and Certification (PCBC) as part of the Integrated Management System. The system covers all internal processes supporting the company's activity and business processes and covers all of the company's assets. Its first certification took place in 2008.

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

- Rules for classifying and handling information,
- Comarch IT network management policy,
- Systems and application administration rules,
- Principles of staying at and access to Comarch premises,
- Principles of the use of assets and bringing equipment out of Comarch,
- Principles of securing personal computers,
- Principles of securing information mediums,
- Principles of remote access,
- Principles of email security,
- Password policy,
- Business continuity policy,
- Antivirus policy.

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

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

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

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

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

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

### **Supplier Sustainability Policy**

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

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

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

These commitments are implemented mainly through:

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

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

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

**G.3.2.** As part of the Supplier Sustainability Policy, the following critical risks were identified:

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



G.3.1.

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

### Policy of Respect for Intellectual Property of Third Parties

*[dimensions: society, employment]*

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

The Comarch Group has implemented the **Policy of Respect for Intellectual Property of Third Parties**.

The basic policy objectives in force regarding these issues are:

- Taking care to ensure respect for intellectual property of third parties,
- Ensuring respect of patents, trademarks and other industrial property rights of third parties,
- The use of intellectual property, patents, trademarks and other industrial property rights of third parties in accordance with the law and the licenses obtained by Comarch,
- Use of third parties' software only in the scope of licenses granted to Comarch,
- Protection of intellectual property, patents, trademarks and other industrial property rights of Comarch,
- Protection of Comarch's interests, in particular financial and legal,
- Care for the high quality of offered products and services,
- Risk management in the area covered by the policy,
- Intellectual property and licenses management.

Detailed objectives the policies resulting from the primary objectives are:

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

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

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

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

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

**G.3.2.**

As part of the Respect for Intellectual Property of Third Parties Policy, the following critical risks were identified: The risk of using unlicensed software for internal needs,

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

**G.3.1.**

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

## **4.2. Management Systems implemented in Comarch Group companies**

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

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

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

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

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

Comarch S.A. designs and manufactures medical devices with a view to improving the quality of life and a sense of security, and out of concern for the health of customers. Taking into account the problems with access to medical staff, solutions in the field of telemedicine and telemonitoring are being implemented, which allow to shorten the distance between the patient and the medical staff. The solutions allow remote care and monitoring of the health of many patients at the same time. The offered products are a response to the needs of the market in the field of prevention and treatment, moreover, they are prepared on the basis of the latest technologies, as a result of cooperation between qualified employees and the scientific medical community. Comarch

guarantees the right quality and safety of the offered products, professional and ethical service, as well as help and advice tailored to the individual needs of customers.

In Comarch S.A. and Comarch Healthcare S.A. Quality Policy has been implemented. In order to implement the provisions of the Policy, the Management Board and employees of the above-mentioned companies are obliged to:

- Meet legal requirements and maintain the effectiveness of the quality management system,
- Set goals adequate to the needs of the organization,
- Adapt products and services to the expectations and requirements of clients, maintaining the requirements of legal regulations in the scope of production and distribution of medical devices and provision of medical services,
- Place products and services on the market that meet the quality and safety requirements,
- Reliably inform about the quality and safety of the offered products and services,
- Constantly and systematically take care for the quality and competitiveness of the offered products and services,
- Develop cooperation with suppliers to improve the quality of offered products and services,
- Raise qualifications.

### G.3.2.

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

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

### G.3.1.

Risk management in the field of medical devices is an extremely important, systemically regulated issue. As part of the implemented and certified quality management system for medical devices in accordance with the ISO 13485 standard, the company has functioned the risk management process, in accordance with the ISO 14971 standard, described in internal procedures. This process includes the principles of identifying risks related to the medical device, its accessories and software, estimating and assessing the acceptability of risks, controlling these risks and monitoring the effectiveness of control.

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

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

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

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

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

### G.2.2.

iMed24 Medical Centre, established in 2012, follows the principles of professionalism, innovation and cooperation based on trust and understanding. Years of experience have allowed us to develop the highest standards of services, which is reflected in the large volume of clients and subcontracting facilities. iMed24 Medical Center operates within the framework of applicable legal requirements and is certified by the Quality Management System ISO 9001:2015. . The scope of the certificate

covers the provision of health services as part of the clinics and laboratories, including the provision of remote services. The certification process is carried out by TUV Rheinland Polska Sp. z o.o.

**G.3.2.**

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

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

**G.3.1.**

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

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

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

**G.2.2.**

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

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

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

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

**Information Security Management System at Comarch AG**

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

**G.2.2.**

Comarch AG is a subsidiary of the Comarch Group, whose goal is to expand into the German market. Comarch AG with Data Center in Dresden, Germany has an Information Security Management System. The company has obtained the appropriate certificate, which proves that the management system meets the requirements of the ISO/IEC 27001:2013 standard. The scope of certification for

Comarch Software und Beratung AG includes IT services, including data center operation, IT services and software development. The certification process is conducted by TÜV Rheinland Cert GmbH.

### 4.3. Code of Conduct of the Comarch Group

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

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

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

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

The Code of Conduct is in force in the subsidiaries of the Comarch Group and obliges them to regularly assess compliance with the principles, standards and values contained in the Code and to update its content based on new trends and customer expectations. The Code reflects the ethical values that the Comarch Group shares to and wishes to follow. It provides the employees of the Comarch Group with a pattern of behaviour towards their co-workers, supervisors and clients, partners and local communities, both in business and business-related relationships.

The Comarch Group Code of Conduct is disseminated and popularized through activities of the Internet and Internal Communication Department, Quality, Health and Safety Department and the Compliance and Internal Audit 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 Compliance and Internal Audit Department. Comarch employees are encouraged to submit any comments and modifications related to the content of this Code of Conduct.

The Compliance and Internal Audit Department 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 Compliance and Internal Audit Department in the scope of reported



inquiries to a dedicated email address. In addition, employees have the option of making anonymous reports about any violations of ethics through internal paper mail. All submissions are reviewed by an independent committee and qualified as approved or rejected. If the notification is recognized, appropriate steps are taken to resolve it. According to the register, in 2023 there was four notification regarding the violation of ethics rules, as a result of which an investigation was conducted.

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

In the occurrence of any irregularities, including in the dimension of employment, employees have the opportunity to report them to supervisors. In addition, reports of any infringements of ethics and with the regulations or procedures applicable in the Comarch Group in the area of compliance may

be reported by employees to the Compliance and Internal Audit Department to [compliance@comarch.pl](mailto:compliance@comarch.pl) or anonymously by internal mail.

In the Comarch Group, 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 2023, on a question in the survey: *Does your company have implemented the Code of Conduct?* „YES” was answered by 48% the companies, which sent back the questionnaires. Suppliers who answered “YES” to this question in 2022 accounted for 66% of respondents.

#### **4.4. Human Rights**

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

The Comarch Capital Group respects and complies with international standards regarding human rights and international labour standards, treating them as fundamental and universal. Respects and implements labour law and occupational safety and hygiene regulations.

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

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

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

The Comarch Group respects the intellectual property of third parties, complying with legal regulations and taking into account international standards in this regard.

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 2022 – 2023.

Comarch S.A.	2023	2022
number of people participating in training	782	1,016
total number of training hours	782	1,016
% of trained employees from among newly hired	85%	84%

Comarch Group	2023	2022
number of people participating in training	843	1,124
total number of training hours	843	1,124
% of trained employees from among newly hired	75%	70%

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 2022 – 2023.

Grupa Comarch	2023	2022
number of people participating in IMS training (people newly hired and repeating the training after 5 years)	1,283	1,875

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

## 4.5. Climate Policy

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

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

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

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

#### 4.6. 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 [compliance@comarch.pl](mailto:compliance@comarch.pl) or anonymously to the the Head of the Compliance and Internal Audit Department.

Employees have the right to expect help and support in the field of submitted inquiries to a dedicated email address. In addition, employees have the option of anonymously reporting any ethics violations via internal paper mail. All applications are reviewed by an independent committee and qualified as approved or rejected applications. If the notification is accepted, appropriate actions are taken to resolve it. In addition, a dedicated

application is used to report irregularities in accordance with the applicable procedures, which ensures full anonymity.

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

**S.10.1.**

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

**G.3.2.**

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

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

Internal financial and accounting processes are built based on IT systems that require multi-level decisions and verifications. Access to key data and functions is limited and supervised, and activities are logged in. from an individual user account. All this is designed to prevent unauthorized transactions by employees. Absence of tolerance for corruption and compliance of the principles of fair competition are also contained in point V of the [Comarch Capital Group's Code of Conduct](#).

**S.10.3.**

No confirmed occurrences of corruption.

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

**S.10.2.**

No occurrences of corruption-related behaviours were reported.

## **4.7. 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 1<sup>st</sup> 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 26<sup>th</sup> of April, 2024, the Management Board of Comarch S.A. submitted a statement on the application of corporate governance principles by Comarch S.A. in 2023.

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 2024.

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](http://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 2023, 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 2022 – 2023.

Suppliers of Comarch S.A. - share of purchase value from suppliers in each location	2023	2022
Poland	89%	84%
DACH	2%	5%
Europa-other	7%	6%
Americas	0%	2%
Other	2%	3%

Comarch business region - share of purchase value from suppliers in each location	Local suppliers %		Foreign suppliers %	
	2023	2022	2023	2022
Poland	92%	88%	8%	12%
DACH	31%	30%	69%	70%
Europa-other	25%	25%	75%	75%
Americas	36%	58%	64%	42%
Other	12%	12%	88%	88%

#### 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 2023 amounted to 96% of the value of liabilities and 94% in the Comarch Group. In 2022, the rate of payments received on-time in Comarch S.A. amounted to 95% of the value of liabilities and 96% 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 2022 – 2023 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 2023	Ethics	OHS	Human rights	Respect for the environment	Human rights including the prohibition of child labour or forced labour
Comarch S.A.	81.1%	64.9%	65.6%	65.3%	65.6%
Comarch Group	79.8%	66.5%	67.1%	66.8%	67.1%
Key Manufacturers and Subcontractors in 2022	Ethics	OHS	Human rights	Respect for the environment	Human rights including the prohibition of child labour or forced labour
Comarch S.A.	83.6%	71.5%	71.0%	71.3%	71.0%
Comarch Group	82.9%	66.3%	66.3%	66.5%	66.3%

## 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 2022, 860 surveys (including cyclical ones) were sent from this platform, which were completed by 29 suppliers. By December 31, 2023, 1,042 surveys (including cyclical ones) were sent from this platform, which were completed by 22 suppliers.

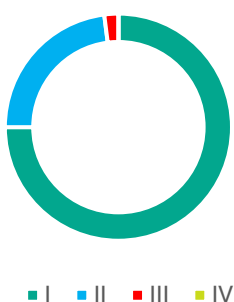
In the next stage of the analysis, after the execution of the order, the quality of cooperation is also evaluated. Included are: flexibility in solving problems, information flow during the process of ordering, keeping the delivery deadline / performance of the service, compliance of the order with the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

The following table presents the categories assigned to suppliers assessing the quality of cooperation in 2022 – 2023.

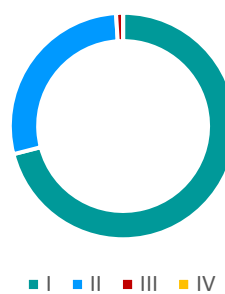
Categories assigned to suppliers	I	II	III	IV
2023	75%	23%	2%	0%
2022	71%	28%	1%	0%

The categories were assigned based on the results of the evaluation of cooperation with 635 entities in 2022 and 625 entities in 2023.

Assessment of cooperation in 2023



Assessment of cooperation in 2022



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 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 2023 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 11<sup>th</sup> of September, 2019. 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. The Internal Control System is designed to prevent transactions that contravene the law in international trade in products of strategic importance, in accordance with the Comarch Group Policy.

### **Safety of Products and Consumers**

The Comarch Group is a producer of IT solutions. 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 2023, 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 27<sup>th</sup> of April, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 /WE (GDPR), in companies for which such an obligation occurred, Personal Data Inspectors were appointed . In addition, a number of registers required by the provisions of the GDPR are kept, including a register of personal data breaches - internal record of personal data breaches.

Both in 2023 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 2023, 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 employees' awareness in the area of personal data protection, in connection with the conducted trainings, information campaigns in the field of personal data protection and instructions implemented on an ongoing basis, translates into not repeating existing breaches, better detection, and thus also affects the prevention of further breaches.

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

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

**S.15.6.**

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

**S.14.1., S.14.3.**

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

## Customer Satisfaction Survey

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

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

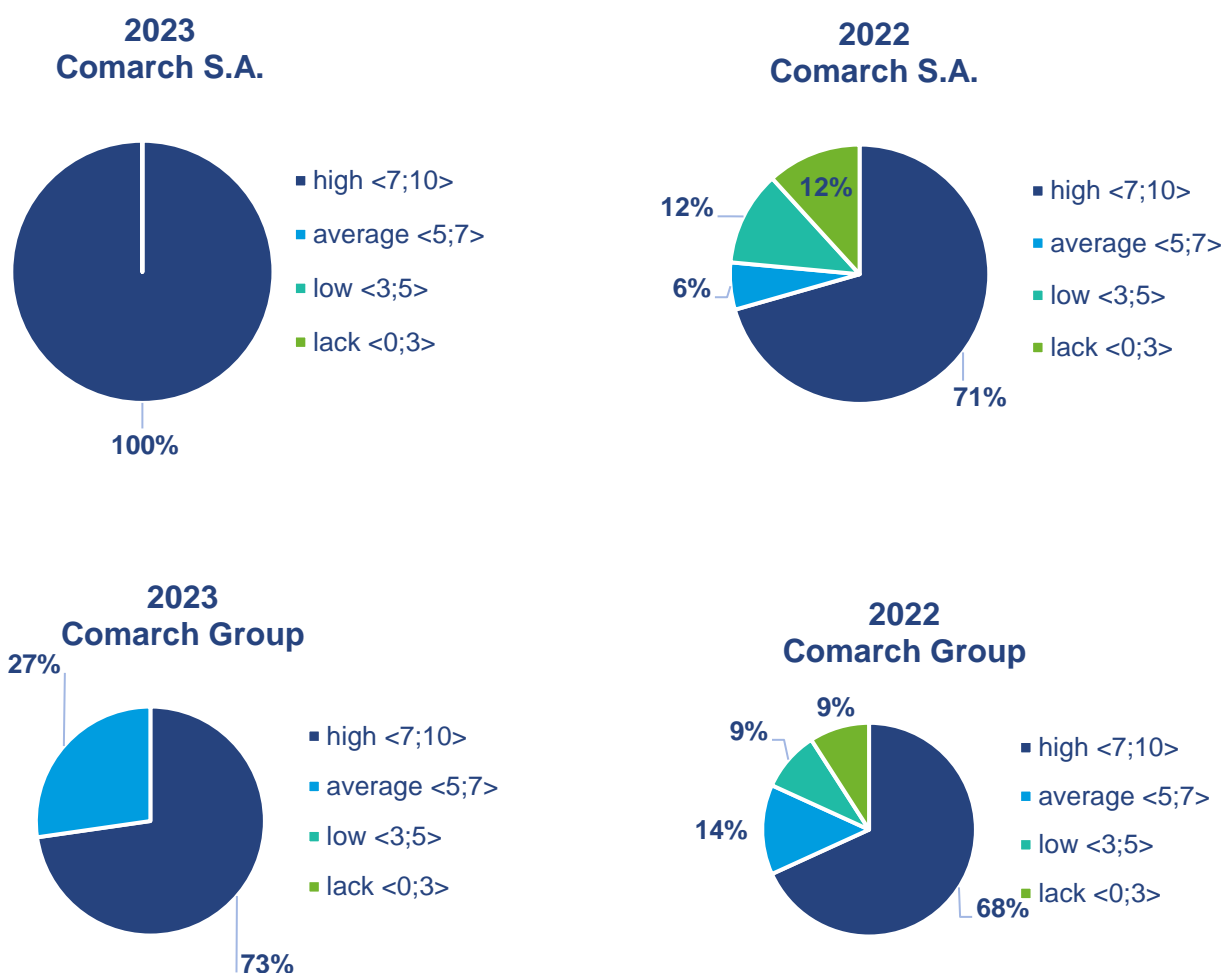


Thanks to the information obtained from the surveys, we can correctly identify and prioritize actions aimed at providing our clients with maximum satisfaction from cooperation with the Comarch Group.

Phases of customer satisfaction survey:

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

The following pie graphs show how the overall satisfaction with cooperation with Comarch S.A. and Comarch Group in 2022 – 2023 was shaped. The indicator of average customer satisfaction consisted of, among others, general satisfaction with cooperation with the Comarch Group, willingness to recommend the Comarch Group products/services to another company, willingness to purchase Comarch products/services in the future, the way how the Comarch Group conducts business talks, negotiations and signing of contracts.



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

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

- Commitment and willingness to help employees,

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

In 2023, customers recognized employee engagement as strengths. They paid particular attention to the satisfactory contact with carers who showed a willingness to help, thorough problem solving, a high level of personal culture and openness, creative thinking, and engage with individuals responsible for technical solutions. Some of the respondents replied that they would be happy to return to using Comarch products in the future as well as recommend Comarch products to others. One of the weaknesses that customers pointed out was the time of faults/reports.

## 6. Human Resources

### 6.1. Employment in the Comarch Group 2019-2023

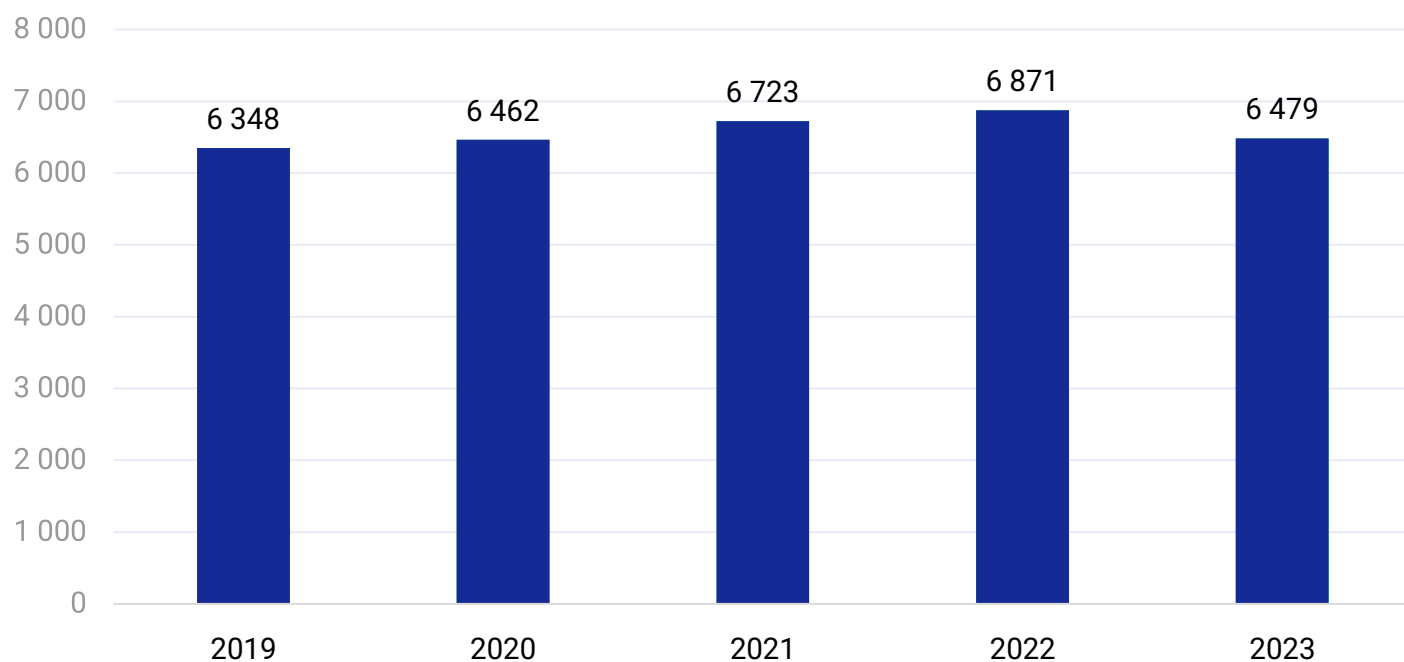
#### Number of employees

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 31<sup>st</sup> of December, 2023, 3,396 employees were employed in Krakow, 2,460 in other cities in Poland and 623 outside of Poland.

As at 31<sup>st</sup> of December, 2023 at Comarch S.A. 5,118 people were employed compared to 5,469 people employed as at 31<sup>st</sup> of December, 2022, while in the entire Capital Group the number of employees decreased to 6,479 people compared to 6,871 people as at 31<sup>st</sup> of December, 2022.

The chart below shows the number of people employed in the Comarch Group in 2019 – 2023.



The tables below present the average number of people employed at Comarch S.A. and in the Comarch Group in 2019 – 2023.

Average number of employees in Comarch S.A.	2023	2022	2021	2020	2019
Employment agreement	4,437	4,585	4,327	4,117	4,057
Other form of employment	681	883	887	925	930
<b>Total</b>	<b>5,118</b>	<b>5,468</b>	<b>5,214</b>	<b>5,042</b>	<b>4,987</b>

Average number of employees in Comarch S.A.	2023	2022	2021	2020	2019
Production employees and technical consultants	4,444	4,774	4,556	4,395	4,330
Marketing and sales	249	217	188	176	180
Management and administrative	383	431	414	413	414
Other	42	46	56	58	63
<b>Total</b>	<b>5,118</b>	<b>5,468</b>	<b>5,214</b>	<b>5,042</b>	<b>4,987</b>

Average number of employees in Comarch Group	2023	2022	2021	2020	2019
Employment agreement	5,349	5,547	5,427	5,119	5,087
Other form of employment	1,167	1,373	1,360	1,383	1,361
<b>Total</b>	<b>6,516</b>	<b>6,920</b>	<b>6,787</b>	<b>6,502</b>	<b>6,448</b>

Average number of employees in Comarch Group	2023	2022	2021	2020	2019
Production employees and technical consultants	5,135	5,461	5,377	5,136	5,103
Marketing and sales	421	383	370	336	321
Management and administrative	459	515	503	499	499
Other	501	561	537	531	525
<b>Total</b>	<b>6,516</b>	<b>6,920</b>	<b>6,787</b>	<b>6,502</b>	<b>6,448</b>

In the course of its operations, both Comarch S.A. and the Comarch Group adjust the number of employees to the level of sales revenues.

### Employment rotation

#### S.2.2., S.2.3.

In 2023, the rotation among employees of Comarch S.A. and the Comarch Group did not differ from the previous years and remained at the standard level for the industry. The company strives to minimize employee turnover, especially among those keys to Comarch Group's activity.

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

### Contracts under which Work is Provided

#### S.2.1., S.2.4.

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

The tables below present the number of people employed at Comarch S.A. and in the Comarch Group in the end of the years 2022 – 2023 according to the type of contract under which the work is provided.

		Comarch S.A.		Comarch Group	
Type of employment	Time	2023	2022	2023	2022
Open-ended contract	Part-time	102	167	150	159
	Full-time	2,763	2,808	3,390	3,535
	<b>Total</b>	<b>2,865</b>	<b>2,975</b>	<b>3,540</b>	<b>3,694</b>
Fixed-term contract	Part-time	43	50	56	63
	Full-time	1,516	1,551	1,741	1,781
	<b>Total</b>	<b>1,559</b>	<b>1,601</b>	<b>1,797</b>	<b>1,844</b>
<b>Total</b>		<b>4,424</b>	<b>4,576</b>	<b>5,337</b>	<b>5,538</b>

		Comarch S.A.		Comarch Group	
Type of employment	Age	2023	2022	2023	2022
Open-ended contract	Under 30 years	486	567	566	681
	30-50 years	2,263	2,316	2,716	2,785
	over 50 years	116	92	258	228
	<b>Total</b>	<b>2,865</b>	<b>2,975</b>	<b>3,540</b>	<b>3,694</b>

Fixed-term contract	Under 30 years	1,093	1,163	1,177	1,269
	30-50 years	449	427	587	545
	Over 50 years	17	11	33	30
	<b>Total</b>	<b>1,559</b>	<b>1,601</b>	<b>1,797</b>	<b>1,844</b>
<b>Total</b>		<b>4,424</b>	<b>4,576</b>	<b>5,337</b>	<b>5,538</b>

Type of employment		Comarch S.A.		Comarch Group	
		2023	2022	2023	2022
Open-ended contract	Women	913	909	1,168	1,192
	Men	1,952	2,066	2,372	2,502
	<b>Total</b>	<b>2,865</b>	<b>2,975</b>	<b>3,540</b>	<b>3,694</b>
Fixed-term contract	Women	565	563	674	666
	Men	994	1,038	1,123	1,178
	<b>Total</b>	<b>1,559</b>	<b>1,601</b>	<b>1,797</b>	<b>1,844</b>
Other forms of employment	Women	75	128	248	298
	Men	619	765	894	1,035
	<b>Total</b>	<b>694</b>	<b>893</b>	<b>1,142</b>	<b>1,333</b>
<b>Total</b>		<b>5,118</b>	<b>5,469</b>	<b>6,479</b>	<b>6,871</b>

#### S.2.5.

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

In 2022 – 2023, all employees employed under a contract of employment at Comarch S.A were paid equal or 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 2022 – 2023 in individual provinces of Poland as of the last day of the year, on a full-time basis

POLAND voivodeship	Comarch S.A.		Comarch Group	
	31 December 2023	31 December 2022	31 December 2023	31 December 2022
dolnośląskie	242	267	253	272
kujawsko-pomorskie	22	23	23	24
lubelskie	226	221	236	230
lubuskie	2	3	2	3
łódzkie	306	338	343	363
małopolskie	2,896	3,120	3,450	3,708
mazowieckie	266	301	308	357
opolskie	7	6	7	6
podkarpackie	112	102	121	116
podlaskie	42	42	43	43
pomorskie	96	99	122	125



śląskie	608	631	644	675
świętokrzyskie	60	59	63	61
warmińsko-mazurskie	1	1	1	1
wielkopolskie	232	256	239	261
zachodniopomorskie	-	-	1	1
<b>Total</b>	<b>5,118</b>	<b>5,469</b>	<b>5,856</b>	<b>6,246</b>

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 2022 – 2023 in individual countries as of the last day of the year.

FOREIGN COUNTRIES			
country	31 December 2023	31 December 2022	
Saudi Arabia	2	1	
Australia	1	1	
Austria	10	11	
Belgium	24	22	
Brazil	-	7	
Chile	1	6	
Finlandia	-	1	
Francja	147	135	
Holland	4	3	
Indonesia	2	-	
Japan	6	7	
Columbia	7	2	
South Korea	3	3	
Luxembourg	1	1	
Malta	5	4	
Germany	231	235	
Panama	4	6	
Russia	1	1	
United States	43	33	
Switzerland	22	20	
Sweden	-	1	
Thailand	18	16	
Turkey	4	4	
Ukraine	50	67	
Great Britain	8	6	
Italy	18	22	
United Arab Emirates	11	10	
<b>Total</b>	<b>623</b>	<b>625</b>	

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 2022– 2023.

Year	Management Body	Age	Woman	Man	Total
31 December 2023	Supervisory Board	under 30 years	-	-	-
		30-50 years	1	-	1
		over 50 years	2	2	4
		Total	3	2	5
	Management Board	under 30 years	-	-	-
		30-50 years	1	7	8
		over 50 years	-	1	1
		Total	1	8	9
Total			4	10	14
31 December 2022	Supervisory Board	under 30 years	-	-	-
		30-50 years	2	-	2
		over 50 years	2	2	4
		Total	4	2	6
	Management Board	under 30 years	-	-	-
		30-50 years	-	5	5
		over 50 years	-	1	1
		Total	-	6	6
Total			4	8	12

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 2022 – 2023. The functions performed as at 31 December are counted, and it is possible for one person to perform several functions.

Year	Management body	Age	Woman	Man	Total
31 December 2023	Supervisory Board	under 30 years	-	-	-
		30-50 years	12	12	24
		over 50 years	6	10	16
	<b>Total</b>		<b>18</b>	<b>22</b>	<b>41</b>

31 December 2022	Management Board	under 30 years	1	-	1	
		30-50 years	13	94	107	
		over 50 years	8	14	22	
		Total	22	108	129	
	Total		40	130	170	
	Supervisory Board	under 30 years	-	-	-	
		30-50 years	4	12	16	
		over 50 years	5	18	23	
		Total	9	30	39	
		Management Board	under 30 years	-	-	-
			30-50 years	12	93	105
			over 50 years	8	22	30
			Total	20	115	135
Total		29	145	174		

## 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.	2023			2022		
Categories of employees *	Woman	Man	Total	Woman	Man	Total
administration	286	74	360	295	79	374
managerial staff	172	465	637	167	495	662
production	929	2,321	3,250	925	2 432	3,357
other	91	86	177	85	98	183
<b>Total</b>	<b>1,478</b>	<b>2,946</b>	<b>4,424</b>	<b>1,472</b>	<b>3,104</b>	<b>4,576</b>

\* employed on the basis of employment contracts

Comarch Group	2023			2022		
Categories of employees *	Woman	Man	Total	Woman	Man	Total
administration	398	121	519	410	122	532
managerial staff	213	544	757	212	573	785
production	1,076	2,656	3,732	1 082	2 795	3,877
other	155	174	329	154	190	344
<b>Total</b>	<b>1,842</b>	<b>3,495</b>	<b>5,337</b>	<b>1,858</b>	<b>3,680</b>	<b>5,538</b>

\* employed on the basis of employment contracts

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

Comarch S.A.	2023				2022			
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	113	226	21	360	141	216	17	374
managerial staff	38	549	50	637	49	576	37	662
production	1,391	1,803	56	3,250	1,493	1,821	43	3,357
other	37	134	6	177	47	130	6	183
<b>Total</b>	<b>1,579</b>	<b>2,712</b>	<b>133</b>	<b>4,424</b>	<b>1,730</b>	<b>2,743</b>	<b>103</b>	<b>4,576</b>

\* employed on the basis of employment contracts

Comarch Group	2023				2022			
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	145	327	47	519	181	306	45	532
managerial staff	42	639	76	757	59	666	60	785
production	1,491	2,088	153	3,732	1,621	2,116	140	3,877
other	65	249	15	329	89	242	13	344
<b>Total</b>	<b>1,743</b>	<b>3,303</b>	<b>291</b>	<b>5,337</b>	<b>1,950</b>	<b>3,330</b>	<b>258</b>	<b>5,538</b>

\* employed on the basis of employment contracts

In 2023, the number of people employed in the age group 30 -50 years old increased the fastest, while the highest growth dynamics occurred in the age group above 50 years.

Categories of employees * Comarch S.A.	2023				2022			
	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	351	9	-	360	366	8	-	374
managerial staff	629	8	-	637	655	7	-	662
production	3,167	77	6	3,250	3,269	82	6	3,357
other	169	8	-	177	174	8	1	183
<b>Total</b>	<b>4,316</b>	<b>102</b>	<b>6</b>	<b>4,424</b>	<b>4,464</b>	<b>105</b>	<b>7</b>	<b>4,576</b>

\* employed on the basis of employment contracts

Categories of employees * Comarch Group	2023				2022			
	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	446	52	21	519	465	51	16	532
managerial staff	686	54	17	757	713	50	22	785
production	3,349	287	96	3,732	3,482	285	110	3,877
other	231	68	30	329	237	74	33	344
<b>Total</b>	<b>4,712</b>	<b>461</b>	<b>164</b>	<b>5,337</b>	<b>4,897</b>	<b>460</b>	<b>181</b>	<b>5,538</b>

\* 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 2023 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 2022 – 2023.

Categories of employees	Comarch S.A.		Comarch Group	
	2023	2022	2023	2022
administration	92%	91%	95%	91%
managerial	70%	67%	70%	69%
production	78%	76%	78%	77%
other	76%	73%	77%	75%

The average salary of women in Comarch S.A. and in the Comarch Group is lower than the average salary of men. This is mainly due to the fact that the employed women have shorter experience in the IT industry and shorter work experience in Comarch, which affects the level of remuneration. In the group of employees, where experience in the industry and seniority are similar for women and men (administration), the level of earnings is on similar level.

## 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 2022 – 2023.

	Sex	Comarch S.A.		Comarch Group	
		2023	2022	2023	2022
The number of people who took of maternity/paternity leave	Woman	84	82	117	119
	Man	20	1	27	6
	<b>Total</b>	<b>104</b>	<b>83</b>	<b>144</b>	<b>125</b>
The number of people who returned to work after the maternity/paternity leave	Woman	78	90	96	122
	Man	19	1	23	5
	<b>Total</b>	<b>97</b>	<b>91</b>	<b>119</b>	<b>127</b>
Return to work rate <sup>a)</sup>	Woman	100%	98%	82%	103%
	Man	100%	100%	85%	83%
Number of people who returned to work after maternity/paternity leave and was still employed for 12 months after returning to work	Woman	81	72	100	91
	Man	1	4	5	6
	<b>Total</b>	<b>82</b>	<b>76</b>	<b>105</b>	<b>97</b>
Employment maintenance rate <sup>b)</sup>	Woman	90%	83%	91%	78%
	Man	100%	80%	90%	76%

<sup>a)</sup> 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 2 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 of contract and sectoral agreements and always comply with the minimum requirements.

In accordance with the applicable law of Comarch S.A., iComarch24 S.A, Comarch Polska S.A., Comarch Healthcare S.A., CA Consulting S.A., Comarch Infrastruktura S.A., Comarch Finance Connect Sp. z o.o., Comarch Cloud S.A., Wszystko.pl sp. z o.o. and MKS Cracovia SSA implemented Employee Capital Plans managed by Aviva Specjalistyczny Fundusz Inwestycyjny Otwarty PPK managed by Towarzystwo Funduszy Inwestycyjnych Allianz Polska Spółka Akcyjna. 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 in areas where the level of public health services is low 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 2022 – 2023.

In thousand PLN	2023	2022
Comarch S.A.	3,726	4,368
Comarch Group	4,181	4,954

#### 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. a group of Employee Representatives was appointed, who operate on the basis of the Agreement concluded in Kraków on 24<sup>th</sup> of May 2006 and the Act of 7<sup>th</sup> of April, 2006 on informing employees and carrying out consultations with them (Journal of Laws of 2006, no. 79 item 550, as amended). 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 March, 2024. Elected Employee Representatives are part of accident teams and participate in consultations conducted by the Employer, as well as occupational health and safety committees. The most important of them included the selection of the institution managing the Employee Capital Plans (PPK) (2019), the rules of company operation and work during a pandemic (2020) and the changes in work regulations: in connection with the introduction of hybrid work and resignation from the obligatory 30-minute break during work (2021), consultations on changes in the Labor Code regarding remote work and sobriety control at work and on changes to the remote work regulations (2023), consultations on changes in medical care for employees (2024).

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. The election of a works council is not compulsory and the decision is made by the employees. Participation in elections is limited by the number of years of service.

Works councils in the DACH area:

- Comarch Solutions GmbH – Innsbruck, the company is also subject to the tariff agreement,

- Comarch AG - The Central works council of the company, and there are also local works councils in most locations.

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

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.

In Brazil, the workers' union takes the form of an external structure. At the end of 2023 all the employees belonged to this union.

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

**S.3.3.** In the last year, no collective disputes were initiated in any of the Comarch Group companies.

In every investment contract concluded under Polish law, the Comarch Group includes a clause requiring the contractor to comply with basic employee rights. Such provisions include, but are not limited to the obligation to employ employees in accordance with applicable regulations, including the provisions of the Labour Code and implementing regulations to this Act, specifying, in particular, the terms of employment, the rules for the payment of remuneration due to employees and the need to comply with other provisions regulating the principles of work performance. Contractors are also contractually obliged to provide employees with safe and hygienic working conditions, including compliance with all obligations resulting from OHS regulations. The number of contracts concluded under non-Polish law is small, however, they also contain provisions containing obligations of contractors to comply with local labour law and OHS regulations.

## 6.2. Training

### S.5.1., S.5.2.

Comarch Training Centre is a section separated from the structures of Comarch S.A. offering specialized training as well as IT and business consultations at every level of advancement, both within internal training addressed to employees of the Comarch Group and offered to a wide range of external clients. The Training Centre uses over 30 years of Comarch experience as a knowledge-based organization. On average approx. 14,000 participants a year participate in over 300 training programs conducted by 90 qualified trainers.

The tables below present the average number of training hours per employee (by gender and employment category) in 2022 – 2023.

Comarch S.A.	2023			2022		
All trainings	managers	others	total	managers	others	total
women	8.2	24.6	22.7	9.3	15.1	14.4
men	4.4	32.7	28.3	9.2	22.2	20.1
<b>Total</b>	<b>5.4</b>	<b>29.9</b>	<b>26.4</b>	<b>9.2</b>	<b>19.8</b>	<b>18.3</b>

Comarch S.A.	2023			2022		
Internal trainings	managers	others	total	managers	others	total
women	8.0	21.8	20.2	9.2	13.3	12.8
men	3.9	30.0	25.9	9.2	20.2	18.5
<b>Total</b>	<b>5.0</b>	<b>27.2</b>	<b>24.0</b>	<b>9.2</b>	<b>17.9</b>	<b>16.7</b>

Comarch Group	2023			2022		
All trainings	managers	others	total	managers	others	total
women	6.7	23.9	25.1	7.2	14.2	15.4
men	3.8	36.6	28.1	7.7	26.4	21.2
<b>Total</b>	<b>4.6</b>	<b>31.8</b>	<b>27.2</b>	<b>7.6</b>	<b>21.6</b>	<b>19.3</b>

Comarch Group	2023			2022		
Internal trainings	managers	others	total	managers	others	total
women	6.5	25.0	22.2	7.0	14.9	13.8
men	3.4	30.6	25.7	7.7	21.9	19.3
<b>Total</b>	<b>4.3</b>	<b>28.8</b>	<b>24.6</b>	<b>7.5</b>	<b>19.5</b>	<b>17.5</b>

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.	2023	2022	Comarch Group	2023	2022
All trainings			All trainings		
women	1,414	1,192	women	1,625	1,368
men	3,437	3,081	men	3,747	3,396
<b>Total</b>	<b>4,851</b>	<b>4,273</b>	<b>Total</b>	<b>5,372</b>	<b>4,764</b>

Comarch S.A.	2023	2022	Comarch Group	2023	2022
Internal trainings			Internal trainings		
women	198	195	women	227	219
men	317	458	men	337	482
<b>Total</b>	<b>515</b>	<b>653</b>	<b>Total</b>	<b>564</b>	<b>701</b>

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

### 6.3. Internship Program

Last year, the 21<sup>st</sup> edition of the Comarch IT internship took place. The summer internship program is addressed to students of the best technical universities in Poland. . The involvement of the entire company in accepting interns means that the refined formula of the internship program is developed and enriched with new elements. As a result, the internship program enjoys great interest and an excellent reputation among IT students and related areas.

Every year, the interest of students translates into a large number of applications.



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

The internship took place in 14 cities in Poland, and students had a choice of 4 profiles: programming, system engineer/ DevOps, Cyber Security and mobile applications.

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 end of the summer program, 90% of the trainees were employed in Comarch, under conditions enabling them to adjust their work to the classes at the university.

### 6.4. Occupational Health and Safety (OHS)

#### System of Supervision and Accident Investigation

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

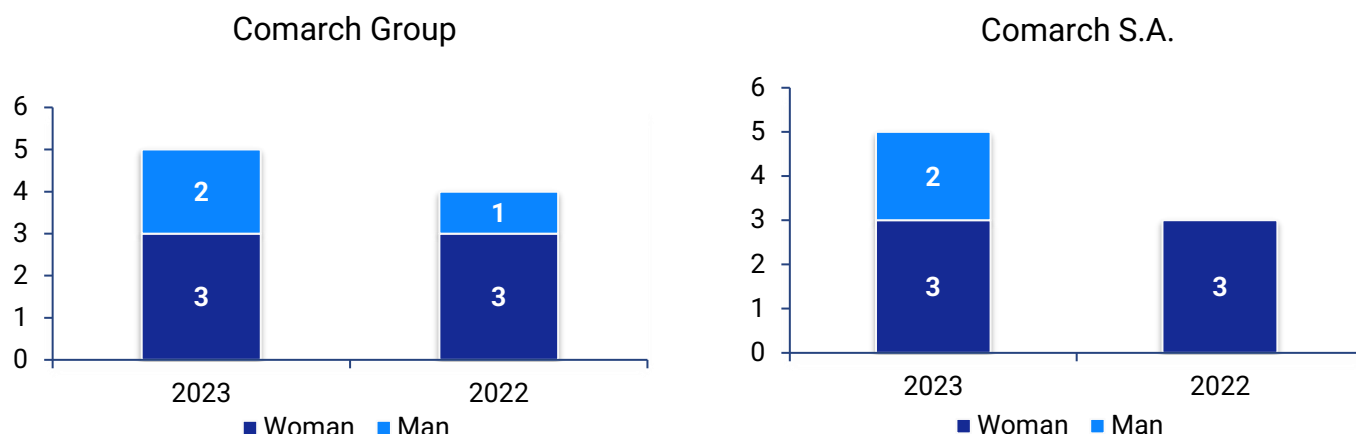
In the Comarch Group, the circumstances and causes of accidents at work are determined by a two-person post-accident team appointed for this purpose by the Employer, which includes

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

## Accidents at Work

In 2023, 6 events took place in the companies of the Comarch Group, 5 of which were recognized as accidents at work. No accidents treated as accidents at work (events occurring 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 2022–2023.



All 5 incidents were classified as light and individual accidents.

## Summary of Data on Accidents at Work in 2022-2023

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)

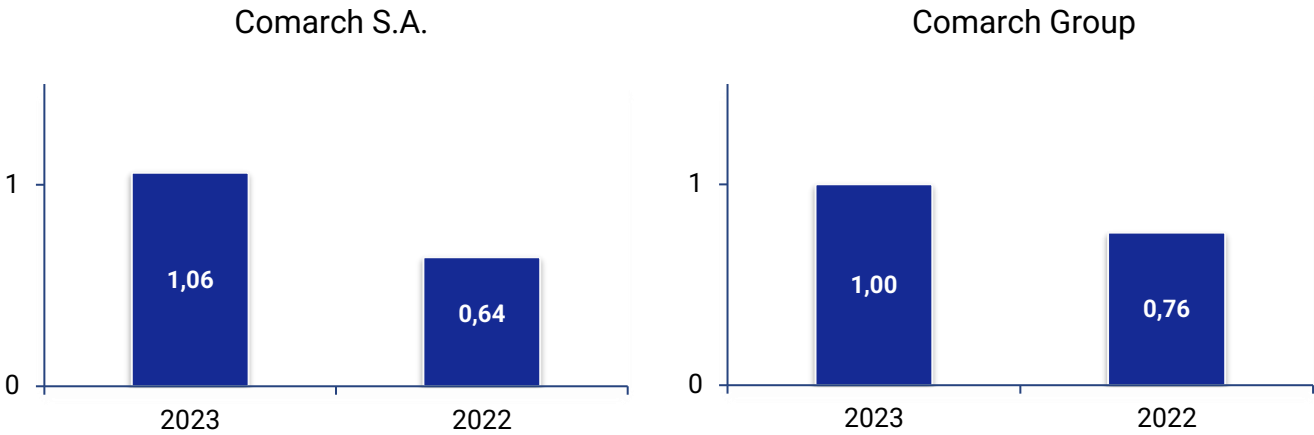
The table below presents the accident rates for the Comarch Group and Comarch S.A. in the years 2022 – 2023.

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
2023	5	5	21	21	1.06	1.06	4.20	4.20
2022	3	4	12	12	0.64	0.76	4.00	3.00

To compare the results, according to the Central Statistical Office report "Accidents at work in the period January-September 2023 - preliminary data", the accident rate (see frequency index - 1.06) in the entire country for the given period was 3.22. For section J - Information and communication it was 0.6.

In 2023, the number of accidents at Comarch S.A. and in the Comarch Group increased compared to 2022. In 2023, the number of absenteeism days due to accidents at work increased from 12 days to 21 days - for the entire Comarch Group. The charts below show the accident frequency rate for Comarch S.A. and the Comarch Group in 2022–2023.

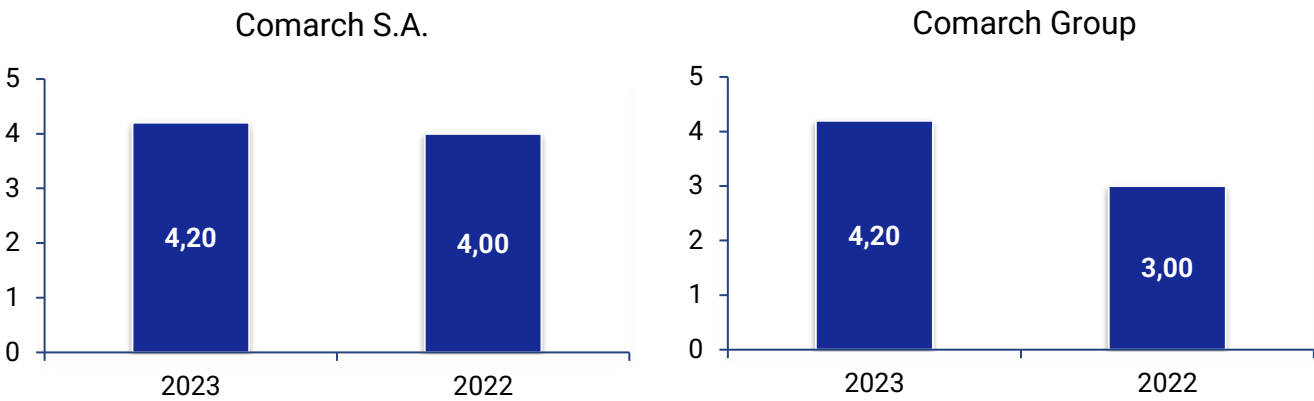




The rate of accidents at work in 2023 at Comarch S.A. was 1.06, while for the entire Comarch Group it was 1.00. Comparing to 2022, an increase of this ratio was recorded in Comarch S.A. and Comarch Group.

Per 1,000 employees in the Comarch Group in 2023, there was 1 accident at work = one injured person (all accidents were individual).

The charts below show the accident severity rate for Comarch S.A. and the Comarch Group in 2022 – 2023.



Accident severity rate at work in 2023, for Comarch S.A., was 4.20, the same for the entire Comarch Group. Comparing to 2022, this indicator increased

Compared to 2022, in the Comarch Group in 2023 the average number of days of incapacity for work caused by an accident at work increased by 1.2 days.

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 164 in total. Rescuers are employees (volunteers) trained in the principles of first aid and emergency evacuation. Every 2 years, training is organized for Rescuers on first aid and on the rules of conduct in the event of fire and evacuation. The trainings are aimed at preparing new Rescuers for their role, and in the case of other Rescuers - refreshing and systematizing the knowledge and providing information on possible changes in first aid standards, as well as organizational changes in the field of evacuation. The last training took place in July, 2021, and 57 people took part in it. The training planned for 2023 has been postponed to 2024.

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

## 7. Activities for the Benefit of Society

### S.9.3.

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

The foundations of CSR in the Comarch Group are the basis for activities in the area of social responsibility. The Code of Ethics was also adopted and functioning in the company. A detailed report on CSR in the Comarch Group is annually documented and presented in the Comarch Group's corporate social responsibility report, which is available on the Internet at: <http://www.comarch.pl/o-firmie/zrownowazony-biznes/csr/> (ENG: <https://www.comarch.com/company/corporate-social-responsibility/>).

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

An e-mail address has been created for communication and the possibility of reporting new issues in this area: [csr@comarch.pl](mailto: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 2023, 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.



### For Pets

The autumn and winter period is a time when the needs of organizations helping homeless animals increase. In 2023, Comarch organized material collections for foundations or associations from several Polish cities. Thanks to the involvement of employees, it was possible to support shelters and foundations in Białystok, Poznań, Katowice, Gdańsk, Gliwice Kraków, Kielce Łódź, Wrocław and Warszawa.

### **Christmas Help**

As in previous years and in 2023, 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: Mother's House in Warsaw, the Hospice of St. Łazarza, in Kraków, Home Foundation in Łódź, Hospice of the Little Prince in Lublin, Sociotherapeutic day room Neverland, SI-GAJA Foundation, Children's Home. Zakątek, Hospice of Fr. Dutkiewicza in Gdańsk, Help Them Foundation, Parkowa Center for Care and Education Facilities.

### **IT Equipment for Those in Need**

In 2023, Comarch S.A. made a donation of several hundred pieces of computer equipment for schools, foundations, orphanages, and public benefit organizations.

### **Polish Day in Brussels**

Comarch was the main sponsor of the event organized periodically by the Embassy of the Republic of Poland in Brussels together with business partners. Polish Day in Belgium was an opportunity for Comarch to present itself as a leading Polish investor in Belgium, as well as to carry out activities in the field of HR and employer branding.

### **Cleaning campaign**

A team of Comarch employees took part in a cleaning campaign in the region to celebrate World Earth Day. It was a great opportunity for integration in the company, but also a useful activity for environmental cleanliness.



### **Support for the Full Life Foundation**

In 2023, Comarch once again supported the Full Life Foundation in the form of free assistance to Comarch ERP Optima.

### **Telco: Adaptive Spirit**

Participation in an event organized by Adaptive Spirit, an organization supporting the U.S. Paralympics Ski & Snowboard Team.

During the event, there is a silent auction during which funds are collected for the team and a tournament in which all participants form teams with Paralympic athletes and "fight" together to win. Comarch supported the auction by sending gadgets to the auction.

### **Meeting at Comarch**

The Comarch France branch organized a visit to its data center by a group of children from western Ukraine (Jaworów). Young people came to France to relax, spend time with local families, forget about the cruelty of the war and the tragic fate of their country.

## 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 took part in many meetings with students in Poland and abroad, and in career days in Poland, France and Germany. The company supported financially and substantively the organization of the Consult IT competition for students of Polish universities and the HAcK na Zdrowie training and project event, implemented by universities in Łódź.

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 2023, a partnership with the AGH University of Science and Technology in Krakow was also continued in the field of postgraduate studies in "Financial Analytics and Industrial Process Controlling".

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

### Summer student internship program

The 2<sup>1st</sup> edition of the IT internship took place during the summer holidays. 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:

- lending of Comarch ERP systems in educational versions (over 650 educational facilities and institutions equipped with educational versions of Comarch ERP),
- conducting product certification for students,
- employees giving lectures at universities on topics related to economics and finance
- training in Comarch ERP systems for pedagogical staff.

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



## Comarch Innovation Zone



The Comarch Innovation Zone is a space which presents the technological achievements of the Comarch Group in the field of IT systems, telecommunications, ERP, Finance and banking, as well as artificial intelligence (AI). 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 various technological solutions such as Industry 4.0 and telemedicine.

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.

The Innovation Zone can be visited not only by business partners, but also by young people. Organized tours give guests the opportunity to experience modern technologies and expand their knowledge. Trips to the Innovation Zone are an excellent opportunity for young people to inspire discussions about the future, choice of studies or future career paths. During the tours, the students eagerly interact with modern solutions, and ask a lot of questions, which has a positive impact on the process of deepening their knowledge and interests.

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 zone is therefore a place for everyone - our youngest guests were 10 years old.



At the beginning of 2023, the Zone underwent a general renovation, which allowed for updating graphics, changing films and detailing even more technological curiosities. During 2023, the Zone was visited by almost 1,000 people, including business partners, schools, universities, hospital patients and many others.

### 7.3. Sport and Healthy Lifestyle

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



### **Sponsoring Śląsk Wrocław**

Comarch, together with Infortes, are partners of the Ekstraklasa basketball team Śląska Wrocław in the 2022/2023 season. This is the third season of cooperation, the previous two seasons ended with the team from the capital of Lower Silesia winning the title of Polish Champion and Vice-Champion.

### **Sponsorship of Royale Union Saint-Gilloise SCRL**

In June 2023, Comarch extended the sponsorship agreement with the Royale Union Saint Gilloise club for the next football season (2023/2024). By extending this cooperation, Comarch confirms its commitment to the development of sports and the promotion of local talents, and at the same time strengthens the presence of its own brand in the Benelux region.

### **Sponsorship of a hockey team EVZ Zug**

Comarch supports the local EVZ ice hockey club from the Swiss town of Zug as the official sponsor of youth teams. This club holds the title of Swiss ice hockey champion.

### **Cycling to Work**



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

Cycling campaigns organized in the company are part of the environmental policy.

### **We Run and Help**

In 2023 employees Comarch SA returned to intensive participation in external sports events, many of which were of a charity nature for example Poland Business Run, Give a fiver for a kid or the IT Championship football tournament in Lublin.

Among dozens of other events on which Comarch teams appeared, one can mention either Polish events such as, Cracovia Półmaraton Królewski, Biegnij Warszawo, 4Rest Run, Eco bieg z gwizdkiem, Survival Race,, Bieg Niepodległości, Szczęśliwa 13, Bieg Trzech Kopców, Bieg Powstania Warszawskiego, as well as events organised in France, Belgium and Germany.

### **Charity Sports Competition**

Two months of competition, two tasks to be performed, two categories, one common goal - financial support for a selected aid organization. Last year's Comarch ONrun / ONbike / ONmove competition was attended by several hundred employees who travelled and ran over 63,000 km in total. Thanks to the involvement of employees, we managed to achieve the goal and financially support the foundation “Twarze Depresji”, which runs programmes for free, remote psychological and psychiatric support.

### **Catch the balance**

A sense of safety and comfort, both mentally and physically of employees is the basis of a well-functioning organization. That is why in 2023, the wellbeing program was continued at Comarch - Catch the balance - body, emotions, healthy lifestyle. Webinars with experts in mental health and diet, exercises with physiotherapists, articles on a healthy diet, work ergonomics, time planning were organized, or with doctors about prevention and health promotion.

## Soccer struggles

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



## Golf with Stars

Comarch Benelux supported the Golf with the Stars project, linked to the UZA (University Hospital Antwerp) Foundation. This inspiring initiative aimed to encourage cancer patients to regularly exercise in the soothing beauty of nature.

## Golf Challenge

sponsorship of the Golf Challenge event in honor of Christine Derom. This charitable event, organized by Afia Shuleni took place on 6th October, on the magnificent course of the Royal Latem Golf Club, showcasing a display of skills, sportsmanship, and above all - engagement in the charity. It reflects our dedication to corporate social responsibility and our desire to honor the memory of Christine Dero, who

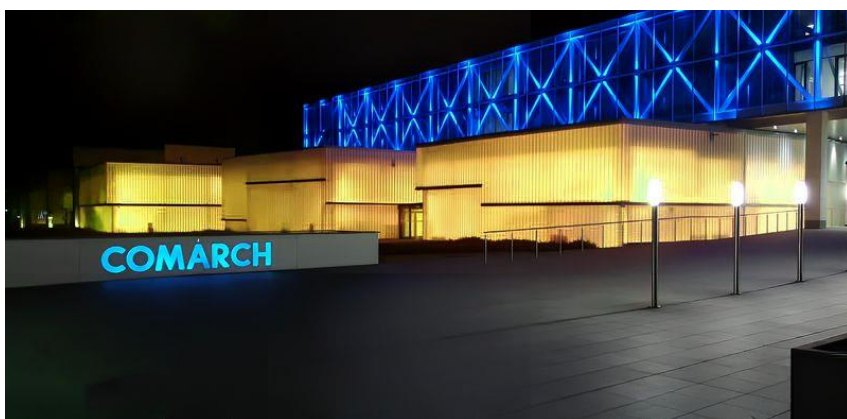
was a remarkable individual who dedicated her life to making a positive impact on the community of Congo and their well-being.

## 7.4. Comarch for Ukraine

The Comarch Group fully expresses its solidarity with the Ukrainian nation in the face of unjustified Russian aggression

In 2022, the Comarch Group ceased operations in Russia due to the military operations in Ukraine and the sanctions being introduced. The continuity of project implementation in Ukraine was maintained and new contracts with Ukrainian clients were concluded.

The effects of the conflict did not have so far a significant negative impact on the company's economic situation, as customers from Ukraine and Russia before the outbreak of the war accounted for approximately 1.5 percent of the Group's sales revenues.



## 7.5. Other activities carried out in 2023 by MKS Cracovia SSA

In 2023, there were many activities for Corporate Social Responsibility. Comarch Cracovia, thanks to years of experience created good CSR practice using the club brand.

## Great Orchestra of Christmas Charity

Supporting the Great Orchestra of Christmas Charity foundation is already a great tradition at Comarch. In 2023, the club supported the 31st edition of the Great Orchestra of Christmas Charity by donating a Champions Hockey League T-shirt signed by the players, the opportunity to watch a Comarch Cracovia match combined

with a visit to the dressing room and a meeting with hockey players, and a football T-shirt signed by Ekstraklasa players.

### Extrahelp

Comarch, together with MKS Cracovia SSA, continues to actively participate in the Extrahelp campaign, which involves mutual promotion of charity collections and donating memorabilia for auction by all teams participating in Ekstraklasa top league games. In 2023, the club got involved in helping Zosia, a little pupil from "Siepomaga". The girl was born with cytomegalovirus, which is a major threat to the health of young children.



### International Day Against Racism

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

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

### Day of Combating Discrimination of Disabled Persons

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

### Extra Class Academy

Comarch, in cooperation with MKS Cracovia SSA and the Ekstraklasa Foundation, once again organized the Extra Class Academy tournament. This is a project that involves the organisation of football matches for children with the support of each Ekstraklasa club. The highlight of the event was the football tournament for U11 players, and for the slightly younger U9 players - the Funino tournament.



The whole event is also a family picnic, which is attended not only by the players but also by their parents and guardians.

### Teddy Bear Game

In 2023, the second edition of the campaign initiated by the Cracovia Football Club took place on Polish Ekstraklasa pitches - "Teddy Bear Game". Fans who came to this match brought stuffed animals with them, which flew onto the pitch after the goal.

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





### Teddy Bear Toss

The ninth edition of the campaign took place in 2023, with fans bringing soft toys to hockey matches. After the first goal scored by Cracovia's hockey players, soft toys thrown from the stands land on the ice. After the match, the mascots are given to young patients at the University Hospital in Krakow - Prokocim and Krakow Children's Homes. A total of 1,645 mascots were collected during the campaign. Cracovia ice hockey players played the match wearing unique sweatshirts

designed in cooperation with the club and financed by the fans. Autographed T-shirts were donated to charity, with the proceeds going to the youth groups of the Cracovia Canpack Hockey Academy.

### "Striped" Children's Day

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

### The #PasiastaWizyta and #PasiasteLekcjeWF projects

The campaign conducted in schools and kindergartens in Kraków and throughout the Małopolskie Voivodeship was aimed at presenting fair-play attitudes by the players of Pasy and promoting love for sport and movement. Football players visited school and early childhood facilities at least twice a month, reminding the children present there of healthy competition, mutual respect, and eliminating all signs of racism in sport. At the meetings, exemplary warm-up exercises for professional athletes, adapted to the level of teenagers, are also presented.

The hockey players also visited schools and kindergartens to show them professional equipment, explain the rules of the game and promote a healthy and active lifestyle.



### Action "Striped" Foretaste of Christmas

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



### Striped Christmas tree in front of the stadium

At the beginning of December, in front of the stadium, next to the statue of Józef Kałuża, red and white lights were lit on a Christmas tree. The event brought together many supporters of all ages. It was a chance to chat, have fun with the players and sing Christmas carols with the help of a group of scouts.



### Szlachetna Paczka (Noble Package)

As every year, the Club supported the popular all over Poland campaign to help those in need. Creating the image of Cracovia as a socially responsible sports organization consisted in this case in purchasing the necessary goods by footballers and hockey players, and then handing them over to persons indicated by the Szlachetna Paczka. In 2023, we helped a multi-

child family from Krakow.

### Action "Classes in Stripes"

, In 2023, the club continued the campaign which aims to disseminate the idea of safe cheering at stadiums and to promote a sports and healthy lifestyle among children and youth. The "Classes in Stripes" campaign is addressed to schools, educational institutions and sports schools, which are invited to matches for the Family Sector for free.

### Hockey Players on Senior Day

Cracovia hockey players participated in Senior Day organized in Krakow's Grzegórzki district. The gathered guests had the opportunity to see professional hockey equipment and talk to the players about this sport, as well as listen to stories about Cracovia's greatest fan – St. John Paul II.

### Cracovia's Action for Turkey

The earthquake that struck Turkey in February 2023 particularly moved the Cracovia team, as the club holds its training camps in this country every year before the spring round of the Ekstraklasa league. Therefore, the club decided to actively assist the victims and conducted a collection of the most necessary items, which were then donated to those in need. As part of the assistance, Cracovia also issued an appeal to other Ekstraklasa clubs to join the action.

## 7.6. Donations and Sponsorship

### S.9.4.

In 2023 the Comarch Group made donations for social purposes with a total value of PLN 111 thousand, and the greatest recipients were Archidiecezja Krakowska and Fundacja Twarze Depresji. 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 370 pieces of electronic equipment (computers, laptops 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 2022– 2023.

in thousands PLN		2023	2022
<b>Comarch S.A.</b>		111	280
<i>the largest recipients</i>	<i>Archidiecezja Krakowska (Archdiocese of Krakow)</i>	<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>	
	<i>Fundacja Twarze Depresji (Foundation Faces of Depression)</i>	<i>Muzeum Polskie w miejscowości Rapperswil w Szwajcarii (The Polish Museum in Rapperswil, Switzerland)</i>	
<b>Comarch Group</b>		127	351
<i>the largest recipients</i>	<i>Hochschule für Technik und Wirtschaft - HTW Dresden, Technische Universität Dresden</i>	<i>Ministry of Health of Ukraine National Children's Specialized Hospital</i>	
		<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>	

**S.9.5.**

The table below shows the total amount spent by Comarch S.A. and the Comarch Group in 2022 – 2023.

In thousands PLN		2023	2022
<b>Comarch S.A.</b>		6,645	6,658
<i>the largest sponsored partners</i>	<i>MKS Cracovia SSA</i>	<i>MKS Cracovia SSA</i>	
	<i>Basketball team Śląsk Wrocław</i>	<i>Last Night of the Proms of Cracow</i>	
<b>Comarch Group</b>		7,020	7,248
<i>the largest sponsored partners</i>	<i>MKS Cracovia SSA</i>	<i>MKS Cracovia SSA</i>	
	<i>Royale Union Saint-Gilloise Football Club</i>	<i>Hockey clubs EVZ Kristall-Club Zug and EVZ Nachwuchs AG</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 are monitored by the organization on an ongoing basis.



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

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

affect the environment. Every year Comarch S.A. defines new achieved ones.

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



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

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

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

### 8.2. The Use of Natural Resources

#### E.1.1., E.1.2.

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

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

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

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

The following table shows the number of kilograms of packaging launched on the market by Comarch S.A. and the Comarch Group in 2022– 2023.

Packaging launched on the market	2023	2022
Comarch S.A.	1,622 kg	1,517 kg
Comarch Group	2,019 kg	2,258 kg

### 8.3. Reduction of Energy Consumption

#### Energy Consumption of Products

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

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

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

#### E.8.2

The table below shows the percentage of revenue from finished goods and related services developed with environmental criteria in Comarch S.A. and the Comarch Group in 2022 – 2023.

Revenue from products and related services developed taking into account environmental criteria	2023	2022
Comarch S.A.	3.0%	2.4%
Comarch Group	4.7%	3.3%

#### 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 power means of transport in 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.

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

In the Comarch approach, is also taken into account consumption for buildings belonging to Comarch Group companies in Dresden( Germany), Lezennes (France) and from 2023 in Arizona (USA).

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

The following tables present the consumption of electricity, heat, gas and other energy carriers at Comarch S.A. and in the Comarch Group in 2022 - 2023.

Comarch S.A.'s Consumption of electricity, heat, gas and fuels	2023	2022
Consumption of energy	16,061,782 kWh	16,474,942 kWh
Consumption of heat	6,274,200 MJ	6,069,710 MJ
Consumption of natural gas	404,742 m <sup>3</sup>	435,003 m <sup>3</sup>
Consumption of gasoline	357,418 kg	336,470 kg
Consumption of diesel fuel	30,295 kg	30,418 kg
Consumption of aviation fuel	34,697 kg	33,379 kg
Total consumption of energy	98,041,810 MJ	100 845,089 MJ
Consumption of energy/employee	19,156 MJ/ employee	18,229 MJ/employee

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

Electricity consumption in 2023 decreased by approx. 2.5% compared to 2022.

The consumption of heat energy is presented as the sum of energy used in the SSE5, SSE6 and SSE7 buildings and in Łódź at Jaracza 78 Stret. This value has been converted and expressed in megajoules. Heat consumption in 2023 increased by approx. 3.4% compared to 2022.

The use of natural gas applies to the buildings of the Economic Zone (SEZ2, SSE3, SSE4) and buildings in Warsaw at Puławska and Leśna Streets. The total gas consumption for these buildings was expressed in cubic meters (m3) and it was found that in 2023 this value decreased by approx. 7.0% compared to 2022.

Fuel consumption is presented for the car fleet in Poland (petrol, diesel oil), as well as for fuel used in slow-moving equipment (petrol) and in machines and aggregates used for emergency power supply (diesel oil). Fuel consumption was given in total, in kilograms, using the following coefficients for calculations: 1 liter of petrol = 0.755 kg, 1 liter of diesel = 0.84 kg, 1 liter of LPG is 0.5 kg from the Regulation of the Minister of Climate (Journal of Laws 2019 item 2443). In 2023, gasoline consumption increased by 6.2% compared to the previous year. In the case of diesel oil, it was an decrease of 0.4%.

JET A-1 aviation fuel consumption is shown for the aircraftowned by Comarch S.A., to be used between 2021 and 2023. Aviation fuel consumption increased by 43.9% compared to 2022.



To calculate the total energy consumption within the organization, the consumption of electricity, heat, natural gas and fuels (gasoline, diesel oil, aviation fuel) presented above were taken into account. Fuel calorific value indices developed by KOBIZE were used to calculate the data. The total energy consumption was converted into megajoules and amounted to 98,041,810 MJ. Compared to 2022, energy consumption decreased by approx. 2.8%. The intensity of energy consumption was also calculated taking into account the number of employees in buildings owned by Comarch S.A.

According to data as at December 31, 2023, Comarch S.A. 5,118 employees were employed, which is an decrease in employment by 351 people compared to the corresponding period of 2022. Energy consumption per person in 2023 amounted to 19,159 MJ, i.e. it increased by approx. 4% compared to 2022.

The table below shows the consumption of electricity, heat, natural gas and other energy carriers in the Comarch Group in 2022-2023.

Consumption of electricity, heat, gas and fuels in the Comarch Group <sup>8)</sup>	2023	2022
Consumption of energy <sup>9)</sup>	23,452,512 kWh	23,594,298 kWh
Consumption of heat <sup>10)</sup>	18,379,000 MJ	17,943,880 MJ
Consumption of natural gas <sup>11)</sup>	404,742 m <sup>3</sup>	435,003 m <sup>3</sup>
Consumption of gasoline <sup>12)</sup>	399,099 kg	386,640 kg
Consumption of diesel oil <sup>12)</sup>	61,247 kg	64,025 kg
Consumption of LPG <sup>13)</sup>	74,772 kg	98,345 kg
Consumption of aviation fuel <sup>14)</sup>	34,697 kg	33,379 kg
Consumption of oil fuel <sup>15)</sup>	12,180 kg	16,019 kg
Total consumption of energy <sup>16)</sup>	145,228,553 MJ	147,357,115 MJ
Consumption of energy/employee <sup>17)</sup>	22,415 MJ/pracownika	21,446 MJ/pracownika

Summary of electricity consumption in the Comarch Group is presented for buildings owned by Comarch S.A. and for buildings owned by other Group companies. buildings in Dresden, Germany, Lezennes, France and in Arizona, in the United States. In addition, the buildings of MKS Cracovia at Wielicka, Siedleckiego, Kałuża and Rączna streets were also presented. In 2023, electricity consumption was lower by approx. 0.6% compared to 2022.

Data on heat energy consumption were collected for the buildings of the Special Economic Zone, the building in Łódź at Jaracza 78 Street, a building in Dresden and MKS Cracovia buildings at Wielicka, Siedleckiego and Kałuża Streets. In 2023, heat consumption increased by approx. 2.4% compared to the previous year.

The use of natural gas was presented for three buildings of the Special Economic Zone - SSE2, SSE3, SSE4 and buildings in Warsaw at Puławska and Leśna Streets, other buildings do not have such a boiler. Consumption decreased by approx. 7.0% compared to 2022.

Consumption of fuels such as gasoline and diesel oil is presented jointly for Polish companies. This list includes fuel consumption by the car fleet, slow-moving equipment and aggregates used for emergency power supply, as well as the machinery park of MKS Cracovia. In 2023, the consumption of gasoline increased compared to 2022. In the case of petrol, consumption increases by 3.2% compared to 2022, while diesel oil consumption decreases by 4.3%.

The consumption of LPG includes consumption for heating the building at Rączna Street, which has been operating since 2021. Consumption decreased by approx. 24.0% compared to 2022.

Heating oil consumption is presented for the MKS Cracovia building at Wielicka Street. The oil is used for heating purposes. In 2023, there was a decrease of 24.0% compared to 2022.

The total energy consumption in 2023 amounted to 145,228,553 MJ and was 1.4% lower than the consumption in 2022. The intensity of energy consumption was also calculated taking into account the total number of people employed in the Comarch Group companies. According to the data as at December 31, 2023, the Comarch Group companies employed 6,474 employees, which is an decrease in employment by 397 people compared to the corresponding period of 2022. Energy consumption per person in 2023 amounted to 22,433 MJ, i.e. it increased by approx. 4.6% compared to 2022.

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

In 2023, the successive replacement of the fleet in the Comarch Group companies took place, similar to previous years, but less dynamic. In 2023, Comarch purchased 27 new vehicles meeting the EURO 6 standard, thus replacing the oldest models and further increasing the percentage of vehicles meeting the stricter standards. In other Polish companies, two new EURO 6 vehicles were purchased.

The annual modernisation of the fleet continues to reduce the number of vehicles that are EURO 5 or below.

The tables below present the percentage of cars in Comarch S.A. and in the Comarch Group meeting individual emission standards in 2022-2023.

Car exhaust emission standards at Comarch S.A.	2023	2022
EURO 6 and zero emission	87,5%	86.5%
EURO 5	12%	13%
EURO 4	0,5%	0.5%

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

Car exhaust emission standards at the Comarch Group	2023	2022
EURO 6 i zeroemisyjne	93%	89%
EURO 5	6%	10%
EURO 4	1%	1%

## 8.4. Water Consumption and Discharged Sewage

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

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



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

The following tables present water consumption in Comarch S.A. and in the Comarch Group in 2022- 2023.

Water consumption in Comarch S.A.	2023	2022
Water consumption	31,178 m <sup>3</sup>	30,888 m <sup>3</sup>
Water consumption per 1 employee	7.99 m <sup>3</sup>	8.22 m <sup>3</sup>

Water consumption in the Comarch Group	2023	2022
Water consumption	71,081 m <sup>3</sup>	81,673 m <sup>3</sup>
Water consumption per 1 employee	16.32 m <sup>3</sup>	19.31 m <sup>3</sup>

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

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

In 2023 a marginal increase in water consumption was observed in Comarch S.A. and a reduction in the Capital Group as a whole compared to the previous year. The intensity of water use per employee declined in both cases in 2023 compared to the previous year. This may be attributed to a reduction in the number of employees in both Comarch S.A. and the Capital Group in 2023 compared to 2022. In 2023, the data from 2022 was recalculated using more accurate information on the number of employees in individual locations.

#### E.6.5

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

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

## 8.5. Greenhouse Gas Emissions

### The Amount of Greenhouse Gas Emissions

#### E.5.1., E.5.3.

The Comarch Group constantly strives to minimize the negative impact of operations on the environment. Therefore, from 2012 the emission of carbon dioxide equivalent to the environment is estimated. Since 2022, we have been trying to act in accordance with the international standard for reporting greenhouse gas emissions - GHG Protocol Corporate Accounting and Reporting Standard, arranging the collected data in three scopes - the so-called Scope 1, Scope 2 and Scope 3. Scope 1 and 2 emissions have already been reported in previous years under the name of direct and indirect emissions. In 2022, in order to increase the transparency of the company, the reporting area was extended to include selected elements of Scope 3.

In 2023, the organisation's employees consistently sought to enhance their understanding of the principles of emission reporting in order to enhance the accuracy and correctness of carbon footprint calculations and the presented values. The fundamental changes made to the adopted methodology in 2023 included updating the adopted emission factors to be more precise and aligned with the appropriate categories, and thus recalculating the data for 2022 in order to standardise the values and obtain comparative data. Furthermore, the use of

updated emission factors for the electricity purchase categories enabled the calculation of emissions of individual gases (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O) from this category, resulting in an increase in the emission values in this range while obtaining more reliable data. The 2022 emissions have been updated accordingly (Tables E.5.4 and E.5.4).\*\*

The report uses a methodology consistent with the GHG Protocol. The data obtained are expressed in the form of carbon dioxide equivalent (CO<sub>2</sub>e). Carbon Dioxide Equivalent is a universal unit of measurement that allows estimating the global warming impact of greenhouse gas emissions such as carbon dioxide, methane, and nitrogen oxide (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O). Estimated carbon dioxide equivalent values are presented below, grouped into the mentioned ranges. Due to the change in the calculation methodology and different sources of emission factors compared to the calculations from previous years, the data from 2022 in the scope of Scope 1 and Scope 2 were recalculated and assigned to appropriate categories in accordance with the GHG standard.

The tables below present the sources of greenhouse gas emissions in Scope 1 in Comarch S.A. and in the Comarch Group in 2022-2023, expressed in carbon dioxide equivalent.

Emission source - Scope 1 at Comarch S.A.	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in 2023	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in 2022**
Stationary combustion	836	888
Mobile burning	1,310	1,237
Leaks from air conditioners	1,117	238
Total CO <sub>2</sub> e emissions	3,263	2,363
CO <sub>2</sub> e emissions/person	0.64	0.43
CO <sub>2</sub> e emissions/revenue unit*	0.0025	0.0020

\*1,000 PLN

\*\*data recalculation

Emission source - Scope 1 in the Comarch Group	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in 2023	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in 2022**
Stationary combustion	1,157	1,243
Mobile burning	1,537	1,504
Leaks from air conditioners	1,117	238
Total CO <sub>2</sub> e emissions	3,811	2,985
CO <sub>2</sub> e emissions/person	0.59	0.43
CO <sub>2</sub> e emissions/revenue unit*	0.0021	0.0016

\* 1,000 PLN

\*\*data recalculation

Scope 1 includes direct emissions, which are those resulting from the combustion of fuels in stationary or mobile sources, as well as leaks from air-conditioning and refrigeration equipment. To calculate this type of emissions, data on fuel consumption by the car fleet, low-speed equipment, machines, generators and aircraft (gasoline, diesel oil, LPG and aviation fuel) were utilised. Furthermore, it incorporates data on fuel consumption (natural gas, heating oil and LPG) in heating installations of buildings owned by Polish companies within the Comarch Capital Group.

In 2023, Comarch S.A. emitted 3,263.15 Mg CO<sub>2</sub>e in Scope 1, representing an increase of approximately 38% compared to 2022. For the Capital Group, the emission of carbon dioxide equivalent amounted to 3,811.05 Mg, which represents an increase of approximately 27.7% compared to the previous year. The intensification of gas emissions in this area was mainly caused by leaks from air-conditioning and refrigeration installations and emissions from fuel combustion in combustion engines.

The table below presents emission sources in Scope 2 in Comarch S.A. and in the Comarch Group in the years 2022-2023, expressed in carbon dioxide equivalent.

Emission source - Scope 2 in Comarch S.A.			CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in Comarch S.A. in 2023	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in Comarch S.A. in 2022**
The purchase of electricity	Market method	based	11,021	11,685
	Location method	based	10,642	-
Purchase of heat energy			398	385
Total CO <sub>2</sub> e emissions			11,419	12,070
CO <sub>2</sub> e emissions/person			2,23	2.21
CO <sub>2</sub> e emissions/revenue unit*			0.0087	0.0100

\*1 000 PLN

Emission source - Scope 2 in Comarch Group			CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in Comarch S.A. in 2023	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in Comarch S.A. in 2022**
The purchase of electricity	Market method	based	13,886	15,040
	Location method	based	13,705	-
Purchase of heat energy			1,131	1,139
Total CO <sub>2</sub> e emissions			15,016	16,178
CO <sub>2</sub> e emissions/person			2.32	2.35
CO <sub>2</sub> e emissions/revenue unit*			0.0083	0.0087

\* 1,000 PLN

\*\*data recalculation

Scope 2 is indirect emissions resulting from the consumption of purchased electricity and heat. Carbon dioxide equivalent in this range for Comarch S.A. in 2023 amounted to 11,419.29 Mg, which is a decrease of approx. 5.4% compared to 2022. The Capital Group had Scope 2 emissions at a level of 15,016.42 Mg CO<sub>2</sub>e, which was lower by 7, 2% from the previous year's value. The equivalent from the purchase of electricity was calculated using two methods, in accordance with the recommendations of the GHG Protocol: the market-based method and the location-based method. The first of these methods focuses on the consumption of electricity by consumers, regardless of where it was produced, while the second takes into account the physical location of the source of electricity production. The market-based method used emission factors defined by the energy supplier. When calculating emissions using the location-based method, emission factors from the national Center for Emission Balancing and Management (KOBIZE) for Polish companies and National and European Emission Factors for Electricity Consumption (NEEFE) and Environmental Protection Agency (EPA) indicators for foreign companies were used.

The table below presents emission sources in Scope 3 in Comarch S.A. and in the Comarch Group in the years 2022-2023, expressed in carbon dioxide equivalent.

Emission source - Scope 3 in the Comarch S.A.,		CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in Comarch S.A. in 2023	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in the Comarch Group in 2022
Business travel		1,693	1,590
Waste processing		0.24	0.30
Total CO <sub>2</sub> e emissions		1,693	1,590

CO <sub>2</sub> e emissions/person	0.33	0.29
CO <sub>2</sub> e emissions/revenue unit*	0.0013	0.0013
* 1,000 PLN		
**data recalculation		
Emission source - Scope 3 in the Comarch Group	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in Comarch S.A. in 2023	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in the Comarch Group in 2022
Business travel	1,717	1,631
Waste processing	0.39	0.50
Total CO <sub>2</sub> e emissions	1,718	1,631
CO <sub>2</sub> e emissions/person	0.27	0.24
CO <sub>2</sub> e emissions/revenue unit*	0.0009	0.0009
* 1,000 PLN		
**data recalculation		

The Scope 3 report on indirect emissions includes emissions from, business travel and waste disposal. Greenhouse gas emissions for Comarch S.A. in 2023 in Scope 3 amounted to 1,693.23 Mg CO<sub>2</sub>e, and for the Capital Group 1,717.77 Mg CO<sub>2</sub>e. A slight increase in the Business Travel category is evident, as a result of new business contacts. In 2023, the category calculations in all 3 scopes were reviewed and recalculated, including in the comparative data, to improve accuracy. In 2023, an attempt was also made to estimate category 7 of Scope 3 (Scope 3) data according to the GHG standard on commuting by conducting a survey of company employees. It was decided, however, not to include this data in the total Scope 3 carbon footprint, due to the potential for duplication of emissions with Scope 1 mobile combustion category data (Scope 1).

Over the next few years, the company will continue to work on further refining the adopted methods for estimating, calculating and collecting data on specified emissions, as well as exploring and implementing new solutions and processes within the organisation that will contribute to expanding Scope 3 emissions reporting to additional categories.

The Scope 3 emission calculations used the sources of indicators developed by DEFRA (Greenhouse Gas Conversion Factor Repository). Using these, emissions associated with waste treatment were calculated.

In the Scope 3 emissions calculations, secondary emission factors EEIO (Environmentally Extended Input-Output data) were additionally used to estimate gas emissions from business trips. These values were calculated using the expenditure-based method, the so-called "spend-based method".

The tables below present the estimated sum of greenhouse gas emissions from Scope 1 and Scope 2 in Comarch S.A. and in the Comarch Group, in the years 2022 - 2023, expressed in carbon dioxide equivalent.

Greenhouse gas emissions Scope 1 and Scope 2 in Comarch S.A.	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in 2023	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in 2022**
Total CO <sub>2</sub> e emissions	14,682	14,434
CO <sub>2</sub> e emissions/person	2.87	2.64
CO <sub>2</sub> e emissions/revenue unit*	0.011	0.012
*1,000 PLN		
Greenhouse gas emissions Scope 1 and Scope 2 in the Comarch Group	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in 2023	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in 2022**
Total CO <sub>2</sub> e emissions	18,827	19,163
CO <sub>2</sub> e emissions/person	2.91	2.79
CO <sub>2</sub> e emissions/revenue unit*	0.0104	0.0103
*1,000 PLN		
**data recalculation		

In terms of Scope 1 and Scope 2, an increase in carbon dioxide equivalent emissions is observed compared to 2022 in the case of Comarch S.A. by approximately 1.7%, while a decrease of approximately 1.8% in the case of the Group.

The tables below present the estimated total greenhouse gas emissions from all three scopes - Scope 1, Scope 2, Scope 3 in Comarch S.A. and in the Comarch Group in 2023, expressed in carbon dioxide equivalent.

Total greenhouse gas emissions Scope 1, Scope 2 and Scope 3 in Comarch S.A.	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in 2023	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in 2022**
Mg CO <sub>2</sub> e emission	16,376	16,024
Mg CO <sub>2</sub> e emissions/person	3.20	2.93
Mg CO <sub>2</sub> e emissions/revenue unit*	0.012	0.013
*1,000 PLN		

Total greenhouse gas emissions Scope 1, Scope 2 and Scope 3 in the Comarch Group	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in 2023	CO <sub>2</sub> equivalent [Mg CO <sub>2</sub> e] in 2022**
Mg CO <sub>2</sub> e emission	20,545	20,795
Mg CO <sub>2</sub> e emissions/person	3.17	3.03
Mg CO <sub>2</sub> e emissions/revenue unit*	0.011	0.011
*1,000 PLN		
**data recalculation		

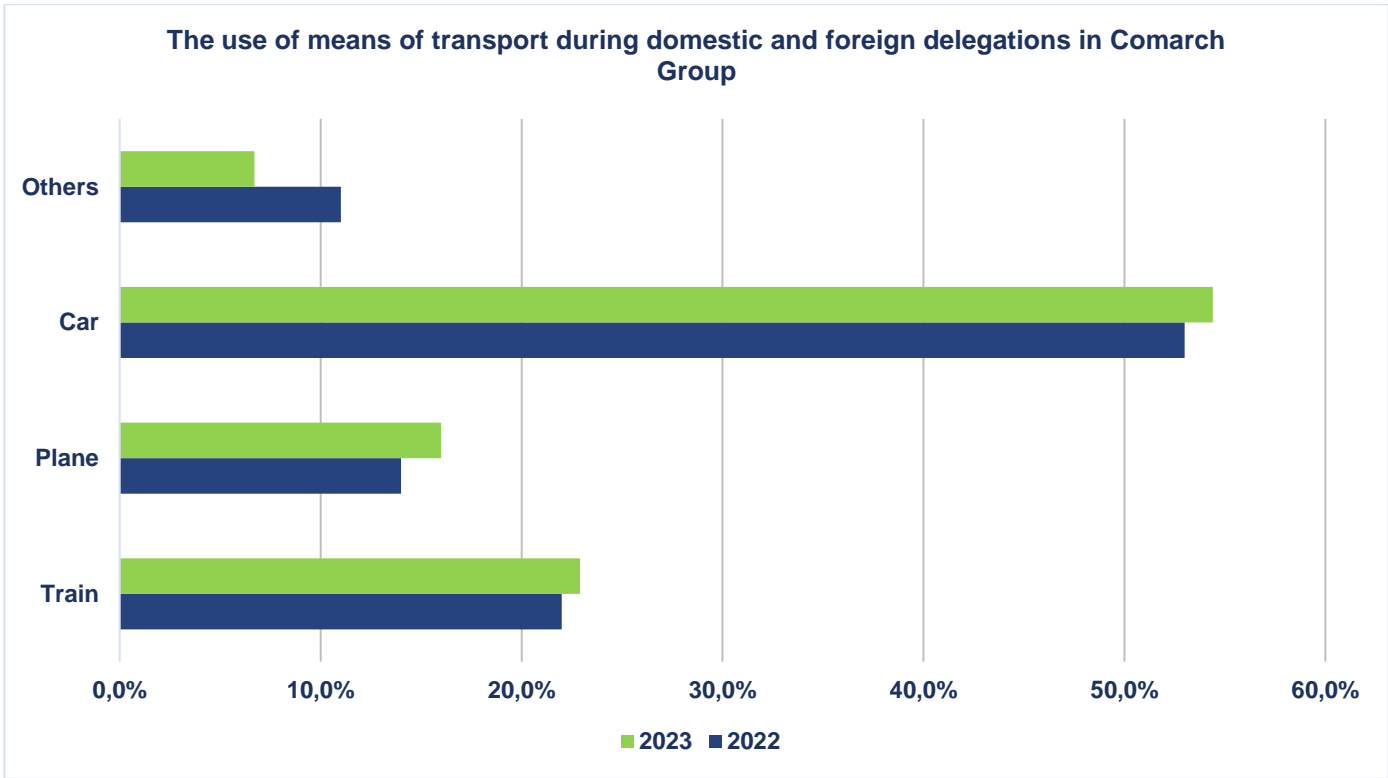
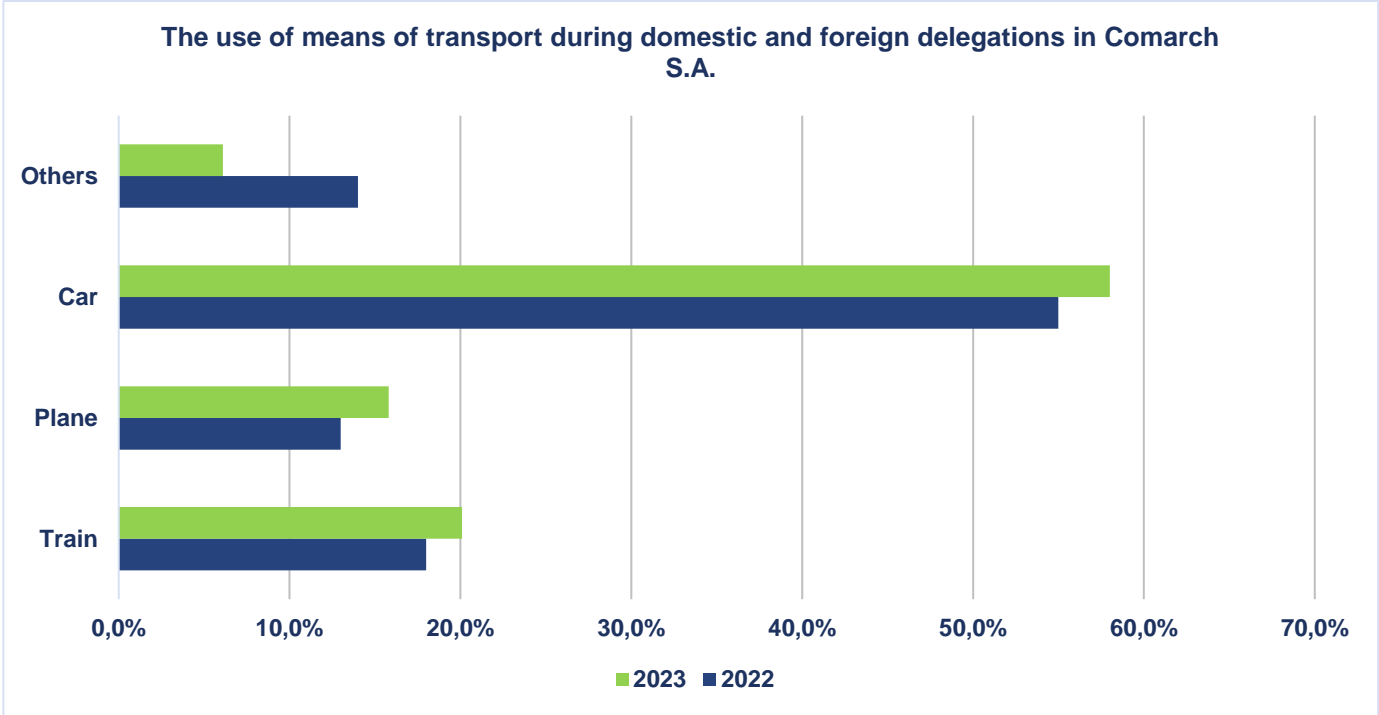
Total greenhouse gas emissions from all three ranges for Comarch S.A. in 2023 amounted to 16,375.67 Mg CO<sub>2</sub>e, and for the Capital Group 20,545.25 Mg CO<sub>2</sub>e. The intensity of greenhouse gas emissions was also calculated, taking into account the number of employees.

In Comarch S.A. according to data as at December 31, 2023, 5,118 people were employed, and in the Capital Group 6,474 people, which is an decrease in employment by 351 and 392 people, respectively compared to the same period in 2022. Total greenhouse gas emissions per person in 2023 amounted to 3.20 Mg CO<sub>2</sub>e (for Comarch S.A.) and 3.17 Mg CO<sub>2</sub>e (for the Capital Group).

The Comarch Group, taking care of both the environment and the reduction of costs related to transport, shortens the supply chain to the maximum by applying the principle of delivery directly from the distribution point to the end user or business partner, wherever possible,

Because clients of the Comarch Group are enterprises from around the world, the number of business trips carried out by Comarch employees is very high. In 2023, the number of delegations in the Comarch Group increased by approx. 5% compared to 2022, but it was still much lower compared to 2019. The car was still the most popular means of transport, its use in relation to other means of transport increased from approx. 53% in 2022 to approx. 54% in 2023. The share of rail and airplane use for the Comarch Group was 4.1% and 14.3%, respectively.

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 2022 - 2023.



**Reduction of Greenhouse Gas Emissions**

Actions related to the reduction of greenhouse gas emissions carried out in 2023:

- 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 ,
- Gradual replacement of combustion vehicles with ones that meet the latest emission standards, increasing employee awareness by promoting ecological values among employees.

**E.5.2., E.5.4.**

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

The tables below present greenhouse gas emissions - carbon dioxide, methane, nitrogen oxide (I) (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O) in Scope 1 and Scope 2 converted to carbon dioxide equivalent in Comarch S.A. and in the Comarch Group in 2021-2023.

Comarch S.A.	2023	2022**
CO <sub>2</sub> Mg CO <sub>2</sub> e emission	13,532	14,161
CO <sub>2</sub> Mg CO <sub>2</sub> e emissions/revenue unit *	0.0103	0.0117
CH <sub>4</sub> Mg CO <sub>2</sub> e emission	5.40	4.71
CH <sub>4</sub> Mg CO <sub>2</sub> e emissions/revenue unit *	4.11*10 <sup>-6</sup>	3.89*10 <sup>-6</sup>
N <sub>2</sub> O Mg CO <sub>2</sub> e emission	16.30	17.48
N <sub>2</sub> O Mg CO <sub>2</sub> e emissions/revenue unit *	1.24*10 <sup>-5</sup>	1.44*10 <sup>-5</sup>

\*1,000 PLN

\*\* data recalculation

Grupa Comarch	2023	2022**
CO <sub>2</sub> Mg CO <sub>2</sub> e emission	17,664	18,875
CO <sub>2</sub> Mg CO <sub>2</sub> e emissions/revenue unit *	0.0097	0.0102
CH <sub>4</sub> Mg CO <sub>2</sub> e emission	6.54	5.91
CH <sub>4</sub> Mg CO <sub>2</sub> e emissions/revenue unit *	3.608*10 <sup>-6</sup>	3.18*10 <sup>-6</sup>
N <sub>2</sub> O Mg CO <sub>2</sub> e emission	26.08	28.35
N <sub>2</sub> O Mg CO <sub>2</sub> e emissions/revenue unit *	1.44*10 <sup>-5</sup>	1.53*10 <sup>-5</sup>

\*1,000 PLN

\*\* data recalculation

The tables below present the total emissions of greenhouse gases - carbon dioxide, methane, nitrogen oxide (I) (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O) in Scope 1, Scope 2 and Scope 3 converted to carbon dioxide equivalent in Comarch S.A. and in the Comarch Group in 2022-2023.

Comarch S.A.	2023	2022**
CO <sub>2</sub> Mg CO <sub>2</sub> e emission	15,220	15,748
CO <sub>2</sub> Mg CO <sub>2</sub> e emissions/revenue unit *	0.012	0.013
CH <sub>4</sub> Mg CO <sub>2</sub> e emission	10.86	6.68
CH <sub>4</sub> Mg CO <sub>2</sub> e emissions/revenue unit *	8.28*10 <sup>-6</sup>	5.52*10 <sup>-6</sup>
N <sub>2</sub> O Mg CO <sub>2</sub> e emission	16.30	17.48
N <sub>2</sub> O Mg CO <sub>2</sub> e emissions/revenue unit *	1.24*10 <sup>-5</sup>	1,44*10 <sup>-5</sup>

\*1,000 PLN

\*\* data recalculation

Grupa Comarch	2023	2022**
CO <sub>2</sub> Mg CO <sub>2</sub> e emission	19,376	20,504
CO <sub>2</sub> Mg CO <sub>2</sub> e emissions/revenue unit *	0.011	0.011
CH <sub>4</sub> Mg CO <sub>2</sub> e emission	12.08	7.95
CH <sub>4</sub> Mg CO <sub>2</sub> e emissions/revenue unit *	6.65*10 <sup>-6</sup>	4.28*10 <sup>-6</sup>
N <sub>2</sub> O Mg CO <sub>2</sub> e emission	26.08	28.35
N <sub>2</sub> O Mg CO <sub>2</sub> e emissions/revenue unit *	1.44*10 <sup>-5</sup>	1.53*10 <sup>-5</sup>

\*1,000 PLN

\*\* data recalculation

In the 2023 reporting year, emissions of individual gases include emissions from electricity purchases, with data also recalculated from 2022 and using appropriate coefficients for a given reporting year.

Pursuant to the Act of 17<sup>th</sup> of July, 2009 on the management system of greenhouse gas emissions and other substances, emissions of greenhouse gases and other substances for 2023 were reported in the National Base on Emissions of Greenhouse Gases and Other Substances (KOBiZE), where information is collected on emission sources, together with the location of the sources and operating parameters of individual installations ("Report for places where the environment is used" and "Report on the operation of equipment"). In addition, in accordance with the Act of 27<sup>th</sup> of April, 2001 Environmental Protection Law, a "List containing information and data on the scope of use of the environment and the amount of fees due" was prepared, on the basis of which fees for the use of the environment were paid (in the case of Comarch Capital Group companies, only introduction of gases and dust into the air) to the account of the competent Marshal's Office.

## 8.6. Waste

### E.6.5

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

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

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

The Comarch Group has implemented waste management procedures. Waste is collected selectively and prevents its negative impact on the natural environment. In the field of waste transport and disposal, the

Comarch Group cooperates only with authorized entities that have technical means and administrative decisions that allow for the management of the transferred waste in a manner that is safe for people and the environment.

The table below shows the amount of waste generated and transferred by the Comarch Group companies in 2022 - 2023. The largest percentage share in the stream of waste generated by the Comarch Group is used electrical and electronic equipment, resulting from the withdrawal from use and replacement of IT equipment (waste code 16 02 14). This waste, in accordance with the applicable legal requirements, undergoes the process of recycling and recovery in waste treatment installations of external companies.

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

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

Type of waste	Code of waste	The amount of waste generated and transferred in 2022 (locations in Poland)	The amount of waste generated and transferred in 2021 (locations in Poland)
Foundry dross and slag	10 10 03	0.0290 Mg	- Mg
Mixed packaging waste	15 01 06	0.7200 Mg	0.8800 Mg
Packaging containing residues of or contaminated by hazardous substances	15 01 10*	- Mg	0.0250 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*	- Mg	0.0080 Mg
Discarded equipment containing CFCs, HCFCs, HFCs	16 02 11*	0.0900 Mg	- Mg
Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12	16 02 13*	0.1300 Mg	0.8470 Mg
<b>Discarded appliances other than those mentioned in 16 02 09 to 16 02 13</b>	<b>16 02 14</b>	<b>8.2460 Mg</b>	<b>11.3330 Mg</b>
<b>Discarded components from discarded equipment other than those mentioned in 16 02 15</b>	16 02 16	0.7580 Mg	- Mg
Spent inorganic chemicals containing hazardous substances (e.g. expired chemical reagents)	16 05 07*	- Mg	0.0200 Mg
Discarded organic chemicals containing hazardous substances (e.g., out-of-date chemicals)	16 05 08*	- Mg	0.0850 Mg
Alkaline batteries (except 16 06 03)	16 06 04	0.0010 Mg	- Mg
Other batteries and accumulators	16 06 05	0.1680 Mg	0.4450 Mg
Wood	17 02 01	1.1500 Mg	- Mg
Plastics	17 02 03	0.1330 Mg	- Mg

Mixed construction waste; repairs and dismantling other than those mentioned in 17 09 01; 17 09 02 and 17 09 03	17 09 04	- Mg	2.5600 Mg
<b>Medical waste (Comarch Healthcare S.A. iMed24 Medical Center)</b>	<b>18 01 03*</b>	<b>6.3460 Mg</b>	<b>6.5640 Mg</b>
Medical waste (Comarch Healthcare S.A., iMed24 Medical Center)	18 01 09	0.0090 Mg	0.0050 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](http://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 2023, 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.), as well as obligations related to recovery and recycling resulting from the Act on the packaging management and packaging waste (for Comarch S.A., Comarch Healthcare S.A. and Comarch Technologies) was carried out by Biosystem Organizacja Odzysku Opakowań S.A.

Companies that did not have signed relevant agreements with recovery organizations in the implementation of obligations under the Act on batteries and accumulators and the Act on the management of packaging and packaging waste, did not achieve the required levels of collection, recovery and recycling, therefore the fees paid for 2023 product fees for these companies.

All reporting obligations in the field of the Act on waste electrical and electronic equipment, on batteries and accumulators, as well as on the management of packaging and packaging waste, which are borne by Comarch Group companies, are carried out only in electronic form, via the Product and Packaging Database and on waste management (BDO), which is available at: [www.bdo.mos.gov.pl](http://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. It monitors changes in legal regulations, recommendations and guidelines of scientific/research units in the field of health and safety, work ergonomics, environmental protection and fire protection on an ongoing basis, and then takes action to implement these changes. At least once a year, an assessment of compliance with applicable legal

**E.7.3., E.7.4.**

requirements and other requirements adopted by the Comarch Group is carried out. The results of the assessment are presented in the documentation prepared as part of the review of the Integrated Management System, and then presented to the Management Board. In the reporting period, no financial penalties and non-financial sanctions have been imposed on Comarch S.A. and the Comarch Group companies for non-compliance with environmental protection regulations.

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

**E.7.1., E.7.2.**

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

**E.7.2.**

ODS and F-gas emissions are monitored in Poland by the Central Register of Operators (CRO), which is a register of devices (including refrigeration, air conditioning) and fire protection systems containing at least 3 kg of controlled substances or 5 tons CO<sub>2</sub> equivalent (CO<sub>2</sub> 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](http://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 2023, there was emission of F-gases (fluorinated greenhouse gases) were observed as a result of failure in refrigeration and air conditioning systems. In each of the cases, the cause of the leak was located in order to remove it, and the missing amount of the refrigerant in the device was supplemented. All uncontrolled leaks were recorded in the CRO database in the cards of individual devices, those specimens that were physically recovered were donated to environmental protection foundations, such as the PROZON Foundation.

The table below presents the total emissions of ODS and F-gases in the Comarch Group in the years 2022 - 2023.

ODS and F-gas emissions	2023	2022
The Comarch Group	459,70 kg	120,00 kg

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

Increased F-gas emissions in 2023 were partly due to damaged sealing valves, which often fail spontaneously due to wear and tear. The company is taking action to prevent or limit uncontrolled leakage of ODS and F-gases from air conditioning systems in the future.

## 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



[illegible]

Since 2018, Comarch S.A. has the BREEM Very Good certificate issued for the SSE7 building, located in the Special Economic Zone in Krakow, within the campus at prof. Michał Życzkowski Street in Krakow. The certificate confirms that the building has been designed with care for ecology and a friendly working environment. Additionally, due to concern for the natural environment, photovoltaic cells were installed on the roof of the building.



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



installed. On the SSE7 building there is a rainwater collection tank with a capacity of 8 m<sup>3</sup> and on the SSE6 building with a capacity of 150 m<sup>3</sup>. This water is used to care for green areas on the company's premises, using an irrigation system.

### **We Are Building an Ecological Car Fleet**

In 2023, over 85% of cars met stringent emission standards, and only 1% of vehicles are cars below the EURO 5 standard. The percentage of cars with ecological drives in the entire structure of the Comarch Group fleet is also constantly increasing - currently there are 23 such

vehicles.

It should also be noted that in German-speaking companies, the process of electrifying the car fleet was initiated in 2023. Expiring leases of conventionally powered vehicles will be replaced by leases of electric vehicles.

In 2023, 8 such vehicles appeared and this process will continue.

### **Employees Are Eco Too!**

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

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

### **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 2023 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 such as employee participation in training, which indirectly reduces the negative impact on the environment. The objectives included the purchase of houses for beneficial insects and the continuation of the fleet modernization process and also to increase the share of renewable electricity by installing a photovoltaic installation at other facilities in the SEZ in Krakow. The organisation has also undertaken the ambitious task of estimating its greenhouse gas emissions within the most difficult to estimate Scope 3 - the value chain - and adding another category to its reporting.

Summary of the implementation of designated activities is part of the review under the Integrated Management System.

### **Investments Related to Environmental Protection**

The Comarch Group constantly modernizes air-conditioning devices to make them more environmentally friendly, at the same time adjusting their operation settings so that energy consumption is most efficient. As part of the ongoing modernisation a trial upgrade is planned to replace the standard motors in the ventilation unit for invector fans. This will reduce electricity consumption and increase efficiency and, reduce the noise of the AHU operation. In addition, the temperatures in the work rooms are constantly analysed and optimized without losing comfort for employees, but at the same time reducing the consumption of thermal energy. In addition, fluorescent luminaires are successively replaced with light sources created in LED technology and more modern and energy-saving devices (EnergyStar) are installed.



A new BMS system for older buildings is planned to be launched in 2024, which will enable even better optimisation of operating parameters, including those of ventilation units.

In 2022, plans were implemented to replace communication and fire lighting with ecological LED lighting in the SSE3 and SSE5 buildings in Kraków and in the buildings at Puławska and Leśna Streets in Warsaw, which will reduce the energy demand by approx. 173 MWh per year. As a result of the implementation of these investments and the pre-certification audit, Comarch became the holder of white certificates worth 14,891 toe. Finally, in 2023, the Energy Regulatory Office granted the company an energy efficiency certificate worth 15,661 toe as a result of the project

In 2022, Comarch continued investments in renewable energy sources. A 50 kWp photovoltaic system was installed on the roof of the SSE6 building in the Krakow Special Economic Zone. In 2023, a second photovoltaic plant will be installed on the roof of this building. Further expansion of the photovoltaic installation is planned for the coming years. The energy produced in this way is used to partially cover the company's own demand for electricity and, if necessary, to resell the excess energy produced to the power grid.

In the coming years, the Comarch Group plans to continue to invest in renewable energy sources, including further expansion of the photovoltaic installations with additional panels.



**Obtaining Energy from RES (Renewable Energy Sources)**

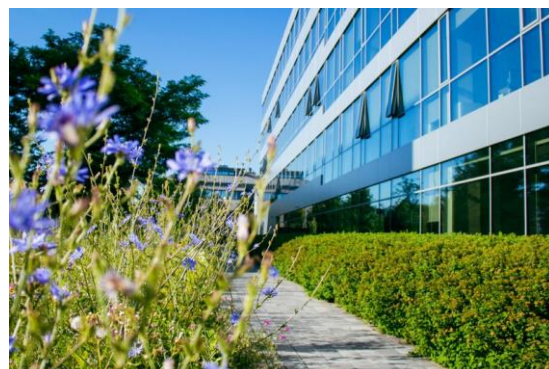
The table below shows the value of energy produced by own photovoltaic installations in the years 2022 - 2023.

Energy produced	2023	2022
Amount of produced energy in [kWh]	303,400	184,200

Parallel to the investment in renewable energy, has been installed 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 m<sup>2</sup> of green areas near the building complex in the Special Economic Zone in Krakow have been converted into a flower meadow, which contributes not only to increases the aesthetic value of the surroundings throughout the summer season but also improves water retention, creates excellent conditions for bees and birds.

Taking into account the above factors, in 2023 red mason bee houses and bird feeders were built on the meadow.



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

The table below presents additional expenses for environmental protection related to the costs of meeting the obligations of collecting, recovering and recycling introduced electronic equipment, packaging, batteries and waste management at Comarch S.A. and in other Polish companies of the Comarch Group in 2022-2023.

Expenditure on environmental protection in the field of waste disposal, recycling and recovery of introduced products (in thousands of PLN)	2023	2022
Comarch S.A.	12	16
Other companies of the Comarch Group	54	58

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

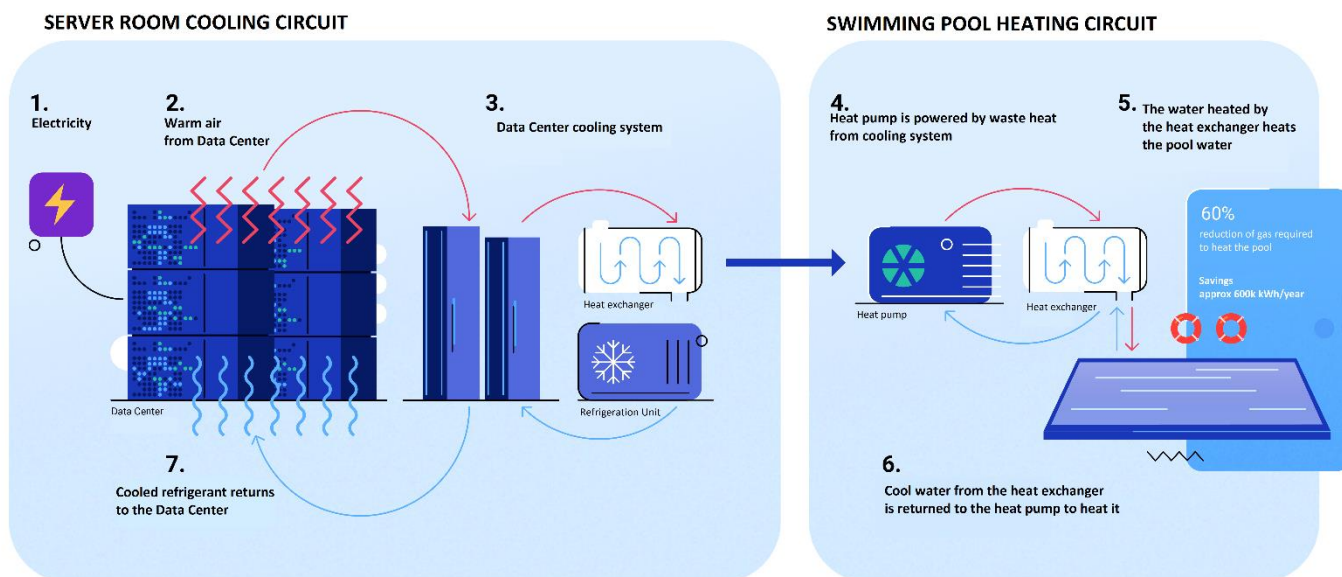
### Heat recovery from server room for sustainable swimming pool heating

In 2023, the design of an installation to recover heat from the server room on campus and, due to its proximity to the leisure complex, to use the recovered heat to heat the swimming pool was initiated.

The concept is based on the design of a modern precision air conditioning system using, among other things, chilled water units and precision air handling units. The chilled water units use water as the heat transfer medium, which is more environmentally friendly than the heat transfer media used in traditional cooling units. Precision air handling units allow the temperature and humidity in the room to be precisely controlled. These high-tech units are therefore optimised for efficient cooling with minimal energy consumption. Despite their higher initial cost, they can deliver significant energy savings in the long term.

The next step will be to connect the installation for collecting and transporting waste heat from the server room cooling system to the swimming pool installation, using a heat pump to heat the water.

The heat recovery diagram is shown below.



The project was completed this year (concept with calculations) and, after initial approval by the Board, the construction design of the installation is being prepared.

In addition to saving energy, the investment will also save natural resources by limiting the use of gas to heat the pool, and will of course have a positive impact on reducing CO2 emissions.

## 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 18<sup>th</sup> 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 „geenwashing“.

The EU Taxonomy disclosures have been prepared on the basis of the EU Taxonomy Regulation issued by the European Commission and a number of implementing acts, i.e:

- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.
- 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").
- Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.
- Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical screening criteria for determining the conditions under which certain economic activities qualify as contributing substantially to climate change mitigation or climate change adaptation and for determining whether those activities cause no significant harm to any of the other environmental objectives
- Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Commission Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities

According to the EU Taxonomy, Comarch S.A. carried out an analysis of the Company's and the Group's principal business activities in 2023 with reference to the taxonomy and presented the following key performance indicators:

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

qualifying for the EU Taxonomy, in the next step, was made an assessment 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 following environmental objectives*:

- climate change mitigation,
- climate change adaptation,
- water and marine resources
- pollution
- circular economy
- biodiversity

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

- contributes substantially to one or more of the six environmental objectives:
  - climate change mitigation,
  - climate change adaptation,
  - sustainable use and protection of water and marine resources,
  - transition to a circular economy,
  - pollution prevention and control,
  - protection and restoration of biodiversity and ecosystems.
- does not significant harm to other environmental objectives (DNSH);;
- is carrying out an economic activity to ensure the alignment with the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation.

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

The process of identifying activities qualifying for the EU Taxonomy consisted of conducting a review of all activities carried out by Comarch S.A. and the companies of the Comarch Group in relation to the environmental goals indicated in the EU Taxonomy. The activities were identified in three areas: generated sales revenues, incurred investment expenditures and incurred operating expenses. The following persons were involved in the process of identifying activities eligible for the EU taxonomy and assessment of their compliance with the Technical Qualification Criteria: managerial staff, business area experts, controlling, people responsible for the ESG area and external experts.

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

No activities have been identified in Comarch S.A. and the Comarch Group that are eligible for the implementation of environmental goals related to adaptation to climate change, sustainable use and protection of water and marine resources, transition to a circular economy, prevention and control of pollution, and protection and restoration of biodiversity and ecosystems.

### **Verification of compliance with the Technical Qualification Criteria**

Comarch S.A. verified compliance with the Technical Qualification Criteria for activities eligible for the taxonomy, i.e. "8.1. Data processing, website management (hosting) and similar activities", on an individual and consolidated level. The verification carried out showed a lack of compliance of the above-mentioned activities with certain Technical Qualification Criteria, i.e.: failure to verify by an independent third party the implementation of the recommended practices listed in the European Code of Conduct on the Energy Efficiency of Data Centers, as well as failure to meet the Global Warming Potential criterion of refrigerants used in air conditioning systems in data centers. The vast majority of refrigerants used have coefficients exceeding the limits indicated in the EU Taxonomy. Comarch will take steps to meet the Technical Qualification Criteria in the coming years.

### **Verification of compliance with Minimum Guarantees**

Verification of compliance with the Minimum Guarantees set out in Art. 18 of Regulation 2020/852 of June 18, 2020, was carried out at Comarch S.A. and the Comarch Group in accordance with the recommendations included in the Final Report on Minimum Safeguards by Platform On Sustainable Finance. Comarch S.A. and companies of the Comarch Group meet the requirements of Minimum Guarantees, i.e. they have and use due diligence solutions that are to ensure conducting business in accordance with the principles and recommendations in such documents as the OECD (Organisation for Economic Co-operation and Development)

Guidelines for Multinational Enterprises and the UN Guidelines on Business and human rights, including the principles and rights set out in the eight core conventions identified in the International Labor Organization Declaration on Fundamental Principles and Rights at Work and the principles and rights set out in the International Charter of Human Rights.

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

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

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

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

### Nuclear energy and natural gas activities

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

Nuclear energy and natural gas activities		YES/NO	
		Comarch S.A.	Comarch Group
<b>Nuclear energy activities</b>			
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO	NO

3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO	NO
	<b>Natural gas activities</b>		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels	NO	NO

## 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 2023 from the point of view of the amount of revenue, capital expenditure or operating expenses, were not included in the indicators.

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

### Turnover

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

- the percentage of turnover eligible for the EU Taxonomy, and compatible with it, was calculated by dividing
  - sums of revenues identified as qualifying for the EU Taxonomy, and compatible with it - (all revenues refer to contracts with customers) by, respectively,
  - revenues of Comarch S.A. disclosed in the profit and loss account in the financial statements of Comarch S.A. for the period 01.01.2023-31.12.2023 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 01/01/2023 to 31/12/2023.

The activity "8.1. Data processing, website management (hosting) and similar activities", which consists of revenues obtained from the provision of services in the cloud model, i.e.: Software as a service (SaaS), Platform as a service (PaaS) and Infrastructure as a service (IaaS). The percentage of revenues related to qualified activities in 2023 for Comarch S.A. is 17%, and for the Comarch Group 15%. This activity was found to be incompatible with the taxonomy of the EU due to the lack of meeting the Technical Qualification Criteria for this activity.

### Capital expenditures (CapEX)

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

- The percentage of capital expenditure (CapEx) eligible for the EU Taxonomy, and compatible with it, was calculated by dividing
  - sums of investment outlays identified as eligible for the systematics of the EU Taxonomy, and compatible with it, by respectively,
  - the sum of investment expenditure included in the financial statements of Comarch S.A. for the period from 01/01/2023 to 31/12/2023, 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 01/01/2023 to 31/12/2023, calculated according to the definition of the EU Taxonomy, according to which the sum of investments includes the increase:
    - *intangible assets (purchase of intangible assets in Note 3.7. Other intangible assets),*
    - *fixed assets (increases in fixed assets in Note 3.3 Property, plant and equipment),*
    - *right-of-use assets (increases in Note 3.4 Right-of-use asset),*
    - *investment property (see Note 3.5 Investment property).*

Investments related to the activity “8.1. Data processing, website management (hosting) and similar activities”, concerning the development of the technical infrastructure of data centers. The percentage of investment outlays related to qualified activities in 2023 for Comarch S.A. is 27%, and for the Comarch Group 31%. These investments were found to be inconsistent with the taxonomy of the EU due to the failure to meet the Technical Qualification Criteria for the activity “8.1. Data processing, website management (hosting) and similar activities.

In addition, in 2023 Comarch S.A., apart from investment expenses and operating expenses related to revenue-generating activities, identified and presented individual investment expenses for activities eligible under the EU taxonomy, which do not generate revenue but enable the reduction of greenhouse gas emissions in the Company and the Group. These expenses have been identified for the following activities:

- Purchase of vehicles for the Comarch fleet, classified under activity 6.5. Transport with motorcycles, cars and light commercial vehicles. The percentage of investment expenditure related to this eligible activity in 2023 is 11.2% for Comarch S.A. and 4.4% for the Comarch Group. These investments have been deemed not to comply with the EU taxonomy as they do not meet the technical screening criteria.
- Purchases related to the replacement of fluorescent lighting with LED lighting and repairs of air conditioning systems, classified under activity 7.3. Installation, maintenance and repair of energy efficiency equipment. The percentage of investment expenditure related to this eligible activity in 2023 is 0.7% for Comarch S.A. and 0.2% for the Comarch Group. These investments were considered not to comply with the EU taxonomy as they did not meet the technical screening criteria.

The total percentage of investment expenditure related to the above eligible activities in 2023 is 38.9% for Comarch S.A. and 36% for the Comarch Group. Comarch S.A. in 2022, it expanded photovoltaic installations for a total amount of PLN 780,000 PLN. Investment in renewable energy sources has been classified under activity



7.6. Installation, maintenance and repair of renewable energy technologies and the percentage of investment expenditure related to this investment was presented in the comparative data for 2022, amounting to 1% for Comarch S.A. and 0.3% for the Comarch Group. In 2023, no similar investments will be made.

### **Operational expenses (OpEX)**

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

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

Expenditures related to the activity "8.1. Data processing, website management (hosting) and similar activities", concerning the maintenance of data center infrastructure in good technical condition. The percentage of operating expenses related to qualified activities in 2023 for Comarch S.A. 2% and for the Comarch Group 6%. The largest share in operating expenses related to the maintenance of tangible fixed assets concerns Comarch's office infrastructure, not directly related to Comarch's operations, which qualifies for the EU Taxonomy. These expenses were found to be inconsistent with the taxonomy of the EU due to the failure to meet the Technical Qualification Criteria for the activity "8.1. Data processing, website management (hosting) and similar activities.

### **Other information**

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

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



\* The code is the abbreviation of the relevant target for which the business activity is eligible to make a significant contribution to the target, and the section number of the target annex dedicated to the activity, i.e:

- Climate Change Mitigation: CCM
- Climate Change Adaptation: CCA
- Water and marine resources: WTR
- Circular economy: CEE
- Pollution Prevention and Control: PPC
- Biodiversity and Ecosystems: BIO

Y – Yes, activity eligible for systematics and in line with systematics for an adequate environmental objective

N – No, activity eligible for systematics but not in line with systematics for an adequate environmental objective

N/EL – Not eligible, non-systematic activity for the relevant environmental objective

	Part of investment expenditure/total investment expenditure	
	Compatibility with the system by objective	Eligibility for systematics by objective
CCM	0%	17%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

Comarch Group - Proportion of turnover from products or services associated with Taxonomy-aligned economic activities

Financial year 2023				Substantial contribution criteria						DNSH criteria (Do No Significant Harm')										
Economic activities (1)	Code(s) (2)	Absolute turnover (3) [in thous. PLN]	Proportion of turnover 2023(4) [%]	Climate change mitigation (5) [%]	Climate change adaptation (6) [%]	Water and marine resources (7) [%]	Pollution (8) [%]	Circular economy (9) [%]	Biodiversity and ecosystems (10) [%]	Climate change mitigation (11) [Y/N]	Climate change adaptation (12) [Y/N]	Water and marine (13) [Y/N]	Circular economy (14) [Y/N]	Pollution (15) [Y/N]	Biodiversity and ecosystems (16) [Y/N]	Minimum safeguards (17) [Y/N]	Taxonomy- aligned proportion of turnover, year 2022 (18) [%]	Category enabling activity (19) [E]	Category transitional activity (20) [T]	
A. ELIGIBLE ACTIVITIES																				
A.1. Types of environmentally sustainable activities (in accordance with the taxonomy)																				
Turnover from environmentally sustainable activities (Taxonomy-aligned) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Y	-		-	
Including supportive	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Y	-	E		
Including in favour of transition										-	-	-	-	-	-	Y	-		Y	
A.2 Activities that qualify for the taxonomy but are not environmentally sustainable (non-taxonomy activities)																				
8.1 Data processing website management (hosting) and similar activities	CCM 8.1	267,172	15%	N	N/EL	N/EL	N/EL	N/EL	N/EL	-	-	-	-	-	-	-	14%			
Turnover from activities qualifying for the taxonomy but not environmentally sustainable (not Taxonomy-aligned activities) (A.2)		267,172	15%	-	-	-	-	-	-	-	-	-	-	-	-	-	14%			
Total (A.1 + A.2)		267,172	15%	-	-	-	-	-	-	-	-	-	-	-	-	-	14%			
B. NON-ELIGIBLE ACTIVITIES																				
Turnover of non-eligible activities (B)		1,548,667	85%																	
Total (A + B)		1,815,839	100%																	

\* The code is the abbreviation of the relevant target for which the business activity is eligible to make a significant contribution to the target, and the section number of the target annex dedicated to the activity, i.e:

- Climate Change Mitigation: CCM
- Climate Change Adaptation: CCA
- Water and marine resources: WTR

- Circular economy: CEE
- Pollution Prevention and Control: PPC
- Biodiversity and Ecosystems: BIO

Y – Yes, activity eligible for systematics and in line with systematics for an adequate environmental objective  
N – No, activity eligible for systematics but not in line with systematics for an adequate environmental objective  
N/EL – Not eligible, non-systematic activity for the relevant environmental objective

	Part of investment expenditure/total investment expenditure	
	Compatibility with the system by objective	Eligibility for systematics by objective
CCM	0%	15%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%



Comarch S.A. - Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities

Financial year 2023					Substantial contribution criteria					DNSH criteria (Do No Significant Harm')										
Economic activities (1)	Code(s) (2)	CapEx (3) [in thous. PLN]	Proportion of turnover 2023(4) [%]	Climate change mitigation (5) [%]	Climate change adaptation (6) [%]	Water and marine resources (7) [%]	Pollution (8) [%]	Circular economy (9) [%]	Biodiversity and ecosystems (10) [%]	Climate change mitigation (11) [Y/N]	Climate change adaptation (12) [Y/N]	Water and marine (13) [Y/N]	Circular economy (14) [Y/N]	Pollution (15) [Y/N]	Biodiversity and ecosystems (16) [Y/N]	Minimum safeguards (17) [Y/N]	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, year 2022 (18) [%]	Category enabling activity (19) [E]	Category transitional activity (20) [T]	
A. ELIGIBLE ACTIVITIES																				
A.1. Types of environmentally sustainable activities (in accordance with the taxonomy)																				
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Y	-		-	
Including supportive	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Y	-	E		
Including in favour of transition										-	-	-	-	-	-	Y	-		Y	
A.2 Activities that qualify for the taxonomy but are not environmentally sustainable (non-taxonomy activities)																				
8.1 Data processing website management (hosting) and similar activities	CCM 8.1	9,108	27.0%	N	N/EL	N/EL	N/EL	N/EL	N/EL	-	-	-	-	-	-	-	11,6%			
6.5. Transport by motorcycles, cars and light commercial vehicles	CCM 6.5	3,784	11.2%	N	N/EL	N/EL	N/EL	N/EL	N/EL								6,7%			
7.3. Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	242	0.7%	N	N/EL	N/EL	N/EL	N/EL	N/EL								0,8%			
7.6. Installation, maintenance and repair of renewable energy systems	CCM 7.6	-	0.0%	N	N/EL	N/EL	N/EL	N/EL	N/EL								1,0%			
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		13,134	38.9%	-	-	-	-	-	-	-	-	-	-	-	-	-	20,1%			
Total (A.1 + A.2)		13,134	38.9%	-	-	-	-	-	-	-	-	-	-	-	-	-	20,1%			
B. NON-ELIGIBLE ACTIVITIES																				
CapEx of Taxonomy-noneligible activities (B)		20,670	61,1%																	

<b>Total (A + B)</b>		<b>33,804</b>	<b>100,0%</b>

\* The code is the abbreviation of the relevant target for which the business activity is eligible to make a significant contribution to the target, and the section number of the target annex dedicated to the activity, i.e:

- Climate Change Mitigation: CCM
- Climate Change Adaptation: CCA
- Water and marine resources: WTR
- Circular economy: CEE
- Pollution Prevention and Control: PPC
- Biodiversity and Ecosystems: BIO

Y – Yes, activity eligible for systematics and in line with systematics for an adequate environmental objective

N – No, activity eligible for systematics but not in line with systematics for an adequate environmental objective

N/EL – Not eligible, non-systematic activity for the relevant environmental objective

	Part of investment expenditure/total investment expenditure	
	Compatibility with the system by objective	Eligibility for systematics by objective
CCM	0%	38.9%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

Comarch Group - Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities

Financial year 2023				Substantial contribution criteria						DNSH criteria (Do No Significant Harm')									
Economic activities (1)	Code(s) (2)	CapEx (3) [in thous. PLN]	Proportion of turnover 2023(4) [%]	Climate change mitigation (5) [%]	Climate change adaptation (6) [%]	Water and marine resources (7) [%]	Pollution (8) [%]	Circular economy (9) [%]	Biodiversity and ecosystems (10) [%]	Climate change mitigation (11) [Y/N]	Climate change adaptation (12) [Y/N]	Water and marine (13) [Y/N]	Circular economy (14) [Y/N]	Pollution (15) [Y/N]	Biodiversity and ecosystems (16) [Y/N]	Minimum safeguards (17) [Y/N]	Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, year 2022 (18) [%]	Category enabling activity (19) [E]	Category transitional activity (20) [T]
<b>A. ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Types of environmentally sustainable activities (in accordance with the taxonomy)</b>																			
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Y	-		-
Including supportive	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Y	-	E	
Including in favour of transition										-	-	-	-	-	-	Y	-		Y
<b>A.2 Activities that qualify for the taxonomy but are not environmentally sustainable (non-taxonomy activities)</b>																			
8.1 Data processing website management (hosting) and similar activities	CCM 8.1	33,264	31.4%	N	N/EL	N/EL	N/EL	N/EL	N/EL								40,2%		
6.5. Transport by motorcycles, cars and light commercial vehicles	CCM 6.5	4,665	4.4%	N	N/EL	N/EL	N/EL	N/EL	N/EL								2,4%		
7.3. Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	242	0.2%	N	N/EL	N/EL	N/EL	N/EL	N/EL								0,3%		
7.6. Installation, maintenance and repair of renewable energy systems	CCM 7.6	-	-	N	N/EL	N/EL	N/EL	N/EL	N/EL								0,3%		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		38,171	36.0%	-	-	-	-	-	-								40,2%		
Total (A.1 + A.2)		38,171	36.0%	-	-	-	-	-	-								40,2%		
<b>B. NON-ELIGIBLE ACTIVITIES</b>																			
CapEx of Taxonomy-noneligible activities (B)		67,953	64.0%																
Total (A + B)		106,124	100.0%																

\* The code is the abbreviation of the relevant target for which the business activity is eligible to make a significant contribution to the target, and the section number of the target annex dedicated to the activity, i.e:

- Climate Change Mitigation: CCM
- Climate Change Adaptation: CCA
- Water and marine resources: WTR
- Circular economy: CEE
- Pollution Prevention and Control: PPC
- Biodiversity and Ecosystems: BIO

Y – Yes, activity eligible for systematics and in line with systematics for an adequate environmental objective

N – No, activity eligible for systematics but not in line with systematics for an adequate environmental objective

N/EL – Not eligible, non-systematic activity for the relevant environmental objective

	Part of investment expenditure/total investment expenditure	
	Compatibility with the system by objective	Eligibility for systematics by objective
CCM	0%	36%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

Comarch S.A. - Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities

Financial year 2023				Substantial contribution criteria						DNSH criteria (Do No Significant Harm')									
Economic activities (1)	Code(s) (2)	OpEx (3) [in thous. PLN]	Proportion of turnover 2023(4) [%]	Climate change mitigation (5) [%]	Climate change adaptation (6) [%]	Water and marine resources (7) [%]	Pollution (8) [%]	Circular economy (9) [%]	Biodiversity and ecosystems (10) [%]	Climate change mitigation (11) [Y/N]	Climate change adaptation (12) [Y/N]	Water and marine (13) [Y/N]	Circular economy (14) [Y/N]	Pollution (15) [Y/N]	Biodiversity and ecosystems (16) [Y/N]	Minimum safeguards (17) [Y/N]	Proportion of Taxonomy aligned (A.1.) or -eligible (A.2.) OpEx, year 2022 (18) [%]	Category enabling activity (19) [E]	Category transitional activity (20) [T]
<b>A. ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Types of environmentally sustainable activities (in accordance with the taxonomy)</b>																			
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Y	-		-
Including supportive	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Y	-	E	
Including in favour of transition										-	-	-	-	-	-	Y	-		Y
<b>A.2 Activities that qualify for the taxonomy but are not environmentally sustainable (non-taxonomy activities)</b>																			
8.1 Data processing website management (hosting) and similar activities	CCM 8.1	904	2%	N	N/EL	N/EL	N/EL	N/EL	N/EL	-	-	-	-	-	-	-	2%		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		904	2%	-	-	-	-	-	-	-	-	-	-	-	-	-	2%		
Total (A.1 + A.2)		904	2%	-	-	-	-	-	-	-	-	-	-	-	-	-	2%		
<b>B. NON-ELIGIBLE ACTIVITIES</b>																			
OpEx of Taxonomy-noneligible activities (B)		46,124	98%																
Total (A + B)		47,028	100%																

\* The code is the abbreviation of the relevant target for which the business activity is eligible to make a significant contribution to the target, and the section number of the target annex dedicated to the activity, i.e:

- Climate Change Mitigation: CCM
- Climate Change Adaptation: CCA
- Water and marine resources: WTR



- Circular economy: CEE
- Pollution Prevention and Control: PPC
- Biodiversity and Ecosystems: BIO

Y – Yes, activity eligible for systematics and in line with systematics for an adequate environmental objective  
N – No, activity eligible for systematics but not in line with systematics for an adequate environmental objective  
N/EL – Not eligible, non-systematic activity for the relevant environmental objective

	Part of investment expenditure/total investment expenditure	
	Compatibility with the system by objective	Eligibility for systematics by objective
CCM	0%	2%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

Comarch Group - Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities

Financial year 2023				Substantial contribution criteria						DNSH criteria (Do No Significant Harm')									
Economic activities (1)	Code(s) (2)	OpEx (3) [in thous. PLN]	Proportion of turnover 2023(4) [%]	Climate change mitigation (5) [%]	Climate change adaptation (6) [%]	Water and marine resources (7) [%]	Pollution (8) [%]	Circular economy (9) [%]	Biodiversity and ecosystems (10) [%]	Climate change mitigation (11) [Y/N]	Climate change adaptation (12) [Y/N]	Water and marine (13) [Y/N]	Circular economy (14) [Y/N]	Pollution (15) [Y/N]	Biodiversity and ecosystems (16) [Y/N]	Minimum safeguards (17) [Y/N]	Proportion of Taxonomy aligned (A.1.) or -eligible (A.2.) OpEx, year 2022 (18) [%]	Category enabling activity (19) [E]	Category transitional activity (20) [T]
<b>A. ELIGIBLE ACTIVITIES</b>																			
<b>A.1. Types of environmentally sustainable activities (in accordance with the taxonomy)</b>																			
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Y	-		-
Including supportive	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	Y	-	E	
Including in favour of transition										-	-	-	-	-	-	Y	-		Y
<b>A.2 Activities that qualify for the taxonomy but are not environmentally sustainable (non-taxonomy activities)</b>																			
8.1 Data processing website management (hosting) and similar activities	CCM 8.1	3,829	6%	N	N/EL	N/EL	N/EL	N/EL	N/EL	-	-	-	-	-	-	-	5%		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		3,829	6%	-	-	-	-	-	-	-	-	-	-	-	-	-	5%		
Total (A.1 + A.2)		3,829	6%	-	-	-	-	-	-	-	-	-	-	-	-	-	5%		
<b>B. NON-ELIGIBLE ACTIVITIES</b>																			
OpEx of Taxonomy-noneligible activities (B)		57,304	94%																
Total (A + B)		61,133	100%																

\* The code is the abbreviation of the relevant target for which the business activity is eligible to make a significant contribution to the target, and the section number of the target annex dedicated to the activity, i.e:

- Climate Change Mitigation: CCM
- Climate Change Adaptation: CCA
- Water and marine resources: WTR

- Circular economy: CEE
- Pollution Prevention and Control: PPC
- Biodiversity and Ecosystems: BIO

Y – Yes, activity eligible for systematics and in line with systematics for an adequate environmental objective  
N – No, activity eligible for systematics but not in line with systematics for an adequate environmental objective  
N/EL – Not eligible, non-systematic activity for the relevant environmental objective

	Part of investment expenditure/total investment expenditure	
	Compatibility with the system by objective	Eligibility for systematics by objective
CCM	0%	6%
CCA	0%	0%
WTR	0%	0%
CE	0%	0%
PPC	0%	0%
BIO	0%	0%

## 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	<u>High</u> /medium/low	S.13.1., S.13.2., S.13.3.
	Product labelling	High/ <u>medium</u> /low	S.14.1., S.14.2., S.14.3.
	Other social and market issues	High/ <u>medium</u> /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)

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