

Anti-Discrimination and Anti-Harassment Policy of the Comarch Capital Group

1. Introduction:

The Comarch Capital Group is guided by the principles of equal treatment, respect and respect for the dignity of each person. We bring together companies that promote a work culture based on diversity, inclusion and mutual respect. We do not accept any form of discrimination or mobbing and our actions comply with national, EU and international standards on human rights and equal treatment

2. Purpose and scope:

The Comarch Group Anti-Discrimination and Workplace Anti-Harassment Policy (the Policy) is a set of principles, standards and commitments aimed at ensuring that the activities of Comarch Group Companies comply with the applicable national, EU and international laws on equal treatment and respect for personal dignity.

The Policy has been approved for application by the Management Board of Comarch SA, and its provisions apply to all employees, associates and representatives of the Comarch Group - both in Poland and abroad. However, if local law in any jurisdiction requires modification or addition to these provisions, local subsidiaries may modify the provisions of the Policy, subject to prior approval of changes by Comarch SA's Compliance and Internal Audit Department.

3. Definitions

Harassment - actions or behaviour involving prolonged and persistent harassment, intimidation, humiliation, isolation or elimination of an employee from a team, leading to an infringement of the employee's dignity or mental health.

Discrimination - unequal, unjustified treatment or exclusion of a person on the basis of personal characteristics such as gender, age, disability, origin, nationality, religion, sexual orientation or other characteristics protected by law.

Violation of personal dignity - any behaviour that humiliates, disrespects or insults a person, causing them to feel uncomfortable, threatened or humiliated.

4. Commitment to equal treatment

Comarch Group companies are committed to complying with applicable non-discrimination legislation

Discrimination on the basis of any personal characteristic, including, in particular, gender, age, disability, ethnicity, nationality, sexual orientation, gender identity, religion, belief, family status or any other characteristic protected by law, is completely unacceptable.

Comarch Group executives have a specific duty to promote, comply with and enforce the principles of this Policy. Executives are expected to respond immediately to any signs of bullying or discrimination and to actively foster a culture based on respect, diversity and inclusion.

5. Condemnation of bullying and any action that violates personal dignity

Bullying, understood as long-term and persistent harassment or intimidation of employees, is totally unacceptable in Comarch Group companies. We condemn all forms of actions that may lead to the violation of personal dignity, psychological degradation or social exclusion of employees. We expect every member of our organisations to actively counter such behaviour and to foster a culture of respect and openness.

6. Examples of unacceptable behaviour

Behaviour which constitutes a breach of this Policy includes, in particular:

- offensive, demeaning or exclusionary comments,
- harassment, intimidation or bullying,
- unjustifiably differentiating between employees in terms of pay, promotion or access to training on the basis of personal characteristics,
- isolating or deliberately ignoring a person in the work environment,
- spreading rumours and slanderous insults.

The above list is illustrative and not exhaustive of all possible forms of bullying and discrimination.

7. Organisational culture

At Comarch Group, we believe that diversity is our strength and that creating a working environment free of discrimination and bullying is our shared responsibility. Therefore:

- we promote a culture of mutual respect and openness,
- we ensure that every employee has equal opportunities for professional development,
- we respond to any signs of inappropriate behaviour,
- we educate our employees on equal treatment and ethical standards.

8. Enforcement of the Policy

Supervision of the implementation of this Policy is exercised by the Compliance and Internal Audit Department, whose tasks include in particular:

- monitoring compliance with the Policy and analysing the situation in the organisation,
- conducting investigations in cases of reported infringements,
- providing confidential reporting channels,
- recommending corrective actions, liaising with the Management Board and external bodies,
- staff and management training.

All reports of violations of the principle of equal treatment and the prohibition of bullying should be reported via system **Whiblo: comarch.whiblo.pl**.

9. Responsibility

We expect all members of the Comarch Capital Group to comply with the principles contained in this Policy. Any breach of these principles will entail consequences as set out in the legislation and contractual provisions.

10. Summary

The Comarch Capital Group strongly opposes all forms of discrimination and bullying. Our goal is to build a working environment where everyone feels respected, valued and treated fairly. Our commitment to equality and respect for human dignity is the cornerstone of our business and a key element of our social responsibility.