

Comarch Group Compliance Policy

1. Purpose and scope:

The Comarch Group Compliance Policy (the Policy) is a set of principles, standards and commitments aimed at ensuring that the activities of Group Companies comply with applicable laws, ethical standards, quality standards and principles of sustainable development.

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.

2. Basic principles of the Compliance Policy

The Comarch Group commits to:

- compliance with national and international law,
- act in accordance with the principles of ethics and fair competition,
- anti-corruption, discrimination, forced labour and child labour,
- environmental protection and consideration of climate impacts in operations,
- respect for human rights and civil liberties,
- attention to information security, quality and sustainability.

Breaches of the Policy are treated as serious misconduct and may result in disciplinary consequences under common law.

3. Systems and policies to support compliance

Integrated Management System (IMS)

The Comarch Group places particular emphasis on the quality of the products offered and services provided. Measures to enhance this value are taken in order to meet the growing and well-defined expectations of customers operating on the domestic and international markets.

The Integrated Management System Policy is the supreme document adopted by Comarch SA, but the companies of the Comarch Group are obliged to apply the standards adopted therein. The IMS covers, among others: product and service quality, environmental protection, occupational health and safety, information security and energy efficiency.

Internal Control System

An Internal Control System has been implemented at Comarch S.A., the chief document of which is the **Internal Control System Policy**. The main principles of this policy are:

- prohibition of transactions contrary to law,
- supervision of trade in goods,
- preventing cooperation with entities suspected of illegal activities.

Cooperation with suppliers

Comarch S.A. has a **Supplier Sustainability Policy**, which defines the most important principles that Comarch follows when carrying out cooperation with its business partners. In addition, the document is a commitment to a sustainable procurement policy and defines expectations for key suppliers. All Comarch Group companies are obliged to apply the principles adopted therein. Among other things, we expect from our key suppliers:

- respect for human rights and labour law,
- acting in accordance with the law and ethical principles,
- environmental responsibility,
- avoidance of child labour, coercion, discrimination and violence.

Respect for the Intellectual Property of Third Parties

Comarch SA has implemented a **Third Party Intellectual Property Rights Policy**. The Comarch Group, as a software development entity, perfectly 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 suppliers, partners and customers.

Ethic

The Comarch Group attaches great importance to complying with current regulations, legislation and acting in accordance with the ethical standards set for itself.

As one of the leaders in the IT market, the Comarch Group feels obliged to promote ethics. **The Code of Conduct** applies to Comarch Group companies and obliges them to regularly assess compliance with the principles, standards and values contained in the Code of Conduct and to update its content on the basis of emerging trends as well as customer expectations.

Any ambiguities are resolved by the Compliance and Internal Audit Department.

Human rights

The Comarch Group respects and complies with national human rights standards and international labour standards, treating them as fundamental and universal. It respects and implements labour and health and safety laws, guarantees freedom of opinion, association, freedom of opinion, conscience and religion, and freedom of belief and expression.

The Comarch Group adheres to the prohibition and prohibits discrimination regardless of its potential cause, in particular on the basis of: race, social status, ethnic origin, religion, disability, gender, sexual orientation, union or political affiliation, age or marital status.

The Comarch Group complies with the prohibition and prohibits child labour under the age of 16, forced labour, corporal punishment, mental and physical coercion and insults, as well as the prohibition on sexual harassment, and considers the workplace to be free of such practices.

Anti-corruption

The Comarch Group adheres to the principles of fair competition, prevention of bribery, illegal payments and corruption. All Comarch Group companies are obliged to apply the principles contained in the **Anti-Corruption Policy**.

In addition, it is a rule within the Comarch Group for all employees to refrain from accepting gifts/presentations from clients and customers, as this could affect the evaluation and verification process of the gifting party and distort the objectivity of the gifted party in its evaluation.

Suspected violations of the Anti-Corruption Policy or other laws may be reported by employees by name or anonymously via the Whiblo system dedicated for this purpose, available at: <https://comarch.whiblo.pl/>

Climate policy

Taking care of climate issues is one of the Comarch Group's priorities. Climate issues are taken into account in the planning of new investments and in the conduct of current activities, which is reflected both in office investments (low- and zero-emission buildings, construction of photovoltaic installations, use of energy-efficient lighting solutions) and in established internal principles related to the organisation of workplaces and building climate awareness among employees (introduction of company-wide solutions concerning waste segregation, promotion and support of pro-environmental initiatives and activities).

Environmental protection

Comarch, through the **Integrated Management System Policy** and the procedures operating under the implemented systems, undertakes to take active measures to reduce its negative impact on the environment.

All Comarch Group companies comply with environmental legislation. The Comarch Group consciously limits the negative impact of its activities on the environment by reducing the consumption of natural resources and limiting the production of waste generated by its current operations. It also promotes ecological lifestyles among its employees by conducting campaigns to encourage active participation in environmental protection.

4. The role of the Compliance and Internal Audit Department

The department is responsible for compliance monitoring, risk assessments, prevention and control activities and the receipt of breach reports.

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