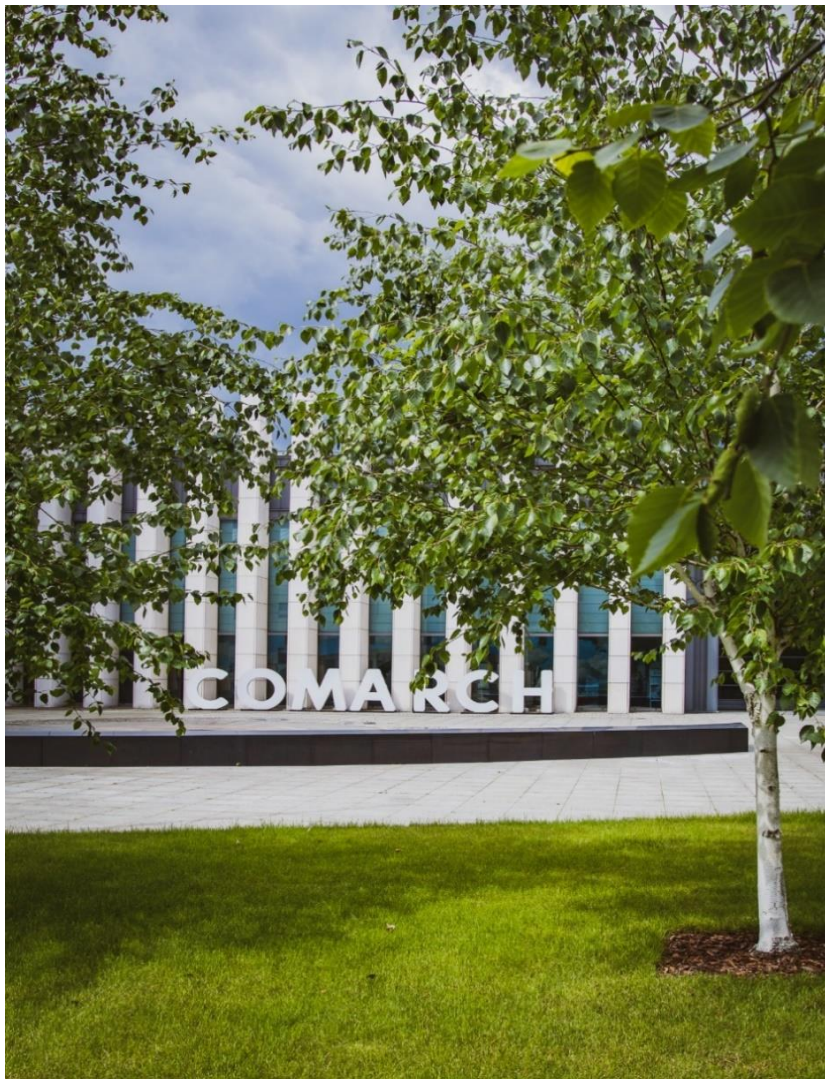


COMARCH



Sustainability Report of Comarch Group for 2024

Krakow, 2 June 2025

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Comarch S.A. Management Board's statement to the company's stakeholders on non-financial reporting

Dear Stakeholders,

The Comarch Group, due to the size of the company and the scope of its operations, has a significant impact on its environment, particularly in the economic and social fields. Sustainable development has been one of the key foundations of the company's strategy since its inception and, in the opinion of Comarch S.A.'s Management Board, has contributed significantly to the company's market success.

Irrespective of formal requirements and ownership changes, the Comarch Group has been following good practices in non-financial and corporate social responsibility reporting for many years. This stems both from the internal need to communicate with stakeholders and from the recommendations of corporate governance and the provisions of the Accounting Act.

The year 2024 was a period of intensive preparation for the Group to fully comply with the new regulations resulting from the entry into force of the CSRD and the European Sustainability Reporting Standards (ESRS). Among other things, the Comarch Group implemented a double materiality approach and developed ESG data management processes across the value chain.

In 2024, the Comarch Group reaffirmed its commitment to climate action by signing a letter of intent with the Science Based Targets initiative (SBTi). We thereby committed to validating climate targets in line with the current state of scientific knowledge and the objectives of the Paris Agreement. In view of the company's business profile, the key sustainability issues for the Comarch Group are social, employment and human rights issues, as well as diversity management issues, especially with regard to management and supervisory bodies. In the opinion of the Management Board of Comarch S.A., adherence to and reporting on relevant standards is essential for the proper management of the company's human resources, and is thus a key element in ensuring the company's ability to grow in the long term and maintain its competitive advantage.

Guided by the principles of responsible business conduct, Comarch joined the United Nations Global Compact - the largest UN global initiative for sustainable business, bringing together more than 24,000 companies and organisations committed to implementing the UNGC Ten Principles in the areas of environment, human rights and corporate governance.

In the past year, the Group continued its activities in key areas related to sustainability and non-financial reporting, such as:

- improving the quality of management,
- promoting pro-social attitudes and healthy lifestyles,
- strengthening diversity awareness among management and staff,
- improving organisational and management procedures,
- environmental protection measures, RES development and environmental education,
- actively supporting culture, sport, local initiatives and charitable causes.

The private equity fund CVC Capital Partners became Comarch's leading shareholder in 2024. By joining the CVC portfolio, the Comarch Group has gained the opportunity to benefit from the experience of CVC and other portfolio companies in terms of sustainable development.

The past year was full of external challenges, such as ongoing global geopolitical tensions, high volatility of exchange rates and energy prices, high labour costs or technological changes in the IT industry. In spite of these unfavourable circumstances, the Comarch Group continued to develop its activities during 2024 and achieved very good financial results, thus proving that it is very well prepared to operate in crisis conditions, regardless of their causes. The Comarch Group, thanks to its very good financial standing, significant product, industry and geographic diversification of its operations, its ability to efficiently adapt to a fast-changing environment and the strong commitment of its employees, is able to fulfil its mission of spreading innovative technical thought created in Poland all over the world, to the satisfaction of its clients, employees, shareholders and the entire socio-economic environment.

The Management Board of Comarch S.A. emphasises that this Sustainability Report covers non-financial information concerning Comarch S.A. and the Comarch Group. The report has been voluntarily prepared on the basis of the European Sustainability Reporting Standards (ESRS) adopted by the European Union and introduced by the Commission Delegated Regulation (EU) 2023/2772. Although there is no formal obligation, the Comarch Group has chosen to apply these standards in order to ensure full transparency, comparability of data and preparation for future regulatory obligations. Disclosure of KPI data was also made in accordance with Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investment (EU Taxonomy).

This report includes data for 2024 and selected comparative data for 2023. No significant adjustments have been made to the comparative data presented in previous reports. This report is subject to certification as well as external verification by professional auditors.

Management Board of Comarch S.A.

Information general

1. General disclosures

1.1. General basis for preparation of the sustainability statement

BP-1

The Comarch Group Sustainability Report has been prepared voluntarily on the basis of the Accounting Act of 29 September 1994, in accordance with the European Sustainability Reporting Standards (ESRS) adopted by the European Union and in force at the date of the Report, as well as the European Taxonomy regulations, including Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment, amending Regulation (EU) 2019/2088.

The scope of this Sustainability Report has been prepared on a consolidated basis and is consistent with that of the Consolidated Financial Statements of the Comarch Group for the 12 months ended 31 December 2024. The document covers all entities within the Comarch Group that have been financially consolidated.

This report applies to the value chain at the level of own operations and the relevant upstream and downstream elements. The assessment of the materiality of impacts, risks and opportunities takes into account the relationships in the value chain to the extent that the Comarch Group can exert real influence or where an increased risk of impact has been identified. Sustainability policies, actions and targets apply primarily to own operations, but in specific areas - such as respect for human rights, diversity or responsible purchasing practices - also include key supply chain partners.

Upstream and downstream data are taken into account in terms of the availability of information and the degree of control or influence of the Group, in particular when disclosing non-financial metrics.

The Group has not exercised the option to omit sensitive information on intellectual property, know-how or innovation or concerning confidential negotiations.

1.2. Disclosures in relation to specific circumstances

BP-2

Time perspectives

Within the framework of this Reporting, the Comarch Group adopted an approach in line with the requirements set out in the ESRS. In order to ensure transparency and comparability of data, the time horizons recommended by the ESRS have been applied, i.e. short-term (1-3 years), medium-term (3-5 years) and long-term (more than 5 years).

For the purposes of the climate scenario analysis and the resilience of the business model described in detail in chapter E1.IRO-1, the Comarch Group adopted its own definitions of time perspectives, following the time perspectives most commonly used in the climate scenarios analysed in the IPCC and IEA studies. The following time perspectives were adopted:

Definitions of the time perspectives adopted for the climate analysis:

- **Short term (up to 2030):** Focus on current climate policies, implementation of short-term actions and their impact on operations,
- **Medium term (2030-2050):** Consideration of energy sector transformation and long-term investment decisions,
- **Long term (up to 2080):** Assessing the impacts of achieving the Paris Agreement goals and their effects on global economic and environmental systems.

Value chain estimation, sources of estimates and uncertainty of results

With regard to the value chain, one of the key metrics estimated from indirect sources is Scope 3 GHG emissions (GHG Scope 3). Due to the limited availability of full physical data from suppliers and partners, these emissions

were calculated partly based on available physical data and partly based on financial data. Details of the calculation methodology are presented in subsection E1-6 of this Report.

For in-house operations, the estimated measure was the stock entered into the unit. Due to the lack of information on actual weights, the number of pieces purchased and averaged unit weights based on manufacturers' specifications were used. Details of the calculation methodology are presented in subsection E5-4 of this Report.

Group-specific disclosures

The Reporting also applies so-called 'Group-specific disclosures', which are not explicitly defined in the ESRS standards, but have been considered relevant in the context of the Comarch Group's business model, operational structure and profile. These disclosures have been labelled and described as 'Specific Disclosures' in the relevant sections of the report.

Use of transitional provisions

In accordance with the transitional provisions provided for in the ESRS, the Comarch Group has decided to exercise the option to temporarily waive the disclosure of certain information. In particular, the 2024 Reporting does not disclose:

- financial valuation of significant risks and opportunities, including the projected financial impacts associated with physical risks, transformational risks and potential opportunities arising from the climate crisis,
- a detailed plan to reach climate neutrality by 2040 in scope 1, 2 and 3, due to the complexity of the issue and the need for further verification and analysis over a longer time horizon.

The decision taken is to ensure the quality and reliability of the data disclosed and to enable the development of realistic and measurable decarbonisation pathways.

2. Conduct of business

2.1. The role of the administrative, management and supervisory bodies

GOV-1

In accordance with the principles of corporate governance and the Commercial Companies Code, Comarch S.A. had a Supervisory Board with a separate Audit Committee in 2024. In accordance with Polish law, the Supervisory Board consists of non-executive directors and is a separate body from the Management Board, which consists of executive directors. There are no representatives of employee organisations on either body.

Supervisory Board of Comarch S.A. as at 31 December 2024:

- Elżbieta Filipiak - President of the Council,
- Krzysztof Krawczyk - Vice-Chairman of the Council from 8 December 2024,
- Andrzej Pach - Vice-Chairman of the Board, Member of the Board since 8 December 2024, meets the independence criteria,
- Elżbieta Bujniewicz-Belka - Member of the Board since 8 December 2024, meets the criteria for independence,
- Joanna Krasodomska - Member of the Board, meets the criteria for independence,
- Jarosław Mikos - Member of the Board since 8 December 2024, meets the independence criteria,
- István Szőke - Member of the Council as of 8 December 2024.

As of 31 December 2024. 57% of the members of the Comarch S.A. Supervisory Board met the independence criteria.

Supervisory Board of Comarch S.A. as at the date of publication:

- Elżbieta Filipiak - President of the Council,
- Krzysztof Krawczyk - Vice-President of the Council,
- István Szőke - Member of the Council.

As of the publication date, 33% of the members of Comarch S.A.'s Supervisory Board were women.

The Supervisory Board oversaw the day-to-day operations of the Company and the Group, in particular by:

- monitoring and analysis of the financial and organisational situation,
- evaluation of the implementation of the strategy by the Management Board of Comarch S.A,
- setting business objectives for the members of the Management Board and evaluating their achievement,
- evaluation of the performance of selected business areas,
- analysis and assessment of the risks associated with the activity,
- supervision of the internal control system.

In particular, **the Audit Committee's** tasks included:

- overseeing the reporting and auditing process and sustainability,
- monitoring the effectiveness of internal control systems, risk management, compliance and the internal audit function,
- verification of the auditor's and auditor's independence and attestation of sustainability reporting.

The Audit Committee discussed ESG issues during its meetings in 2024. During one of the meetings, the head of the Compliance and Internal Audit Department presented the annual "Report on the functioning of the internal control, risk management and compliance system as well as the internal audit function in the Comarch Group", which is regularly presented to both the Audit Committee and the Supervisory Board. As part of this presentation, sustainability topics were also discussed, including:

- existing and upcoming legal requirements in the area of ESG,
- advancing the preparation of the sustainability report,
- integration of ESG aspects into the risk management system,
- planned activities in the area of sustainable development.

Ms Joanna Krasodomska (Ph.D. in economic sciences; employed as a university professor in the Department of Financial Accounting at the Cracow University of Economics; executor of national and international research projects, author of numerous scientific publications dealing with issues of financial reporting and sustainable development; a certified accountant (register no. 890); cooperates with the Association of Accountants in Poland, the Association of Chartered Certified Accountants (ACCA) and the Chartered Institute of Management Accountants (CIMA); represents Poland in the European Accounting Association; is a member of national and international organisations gathering accounting professionals and Chapter Zero Poland).

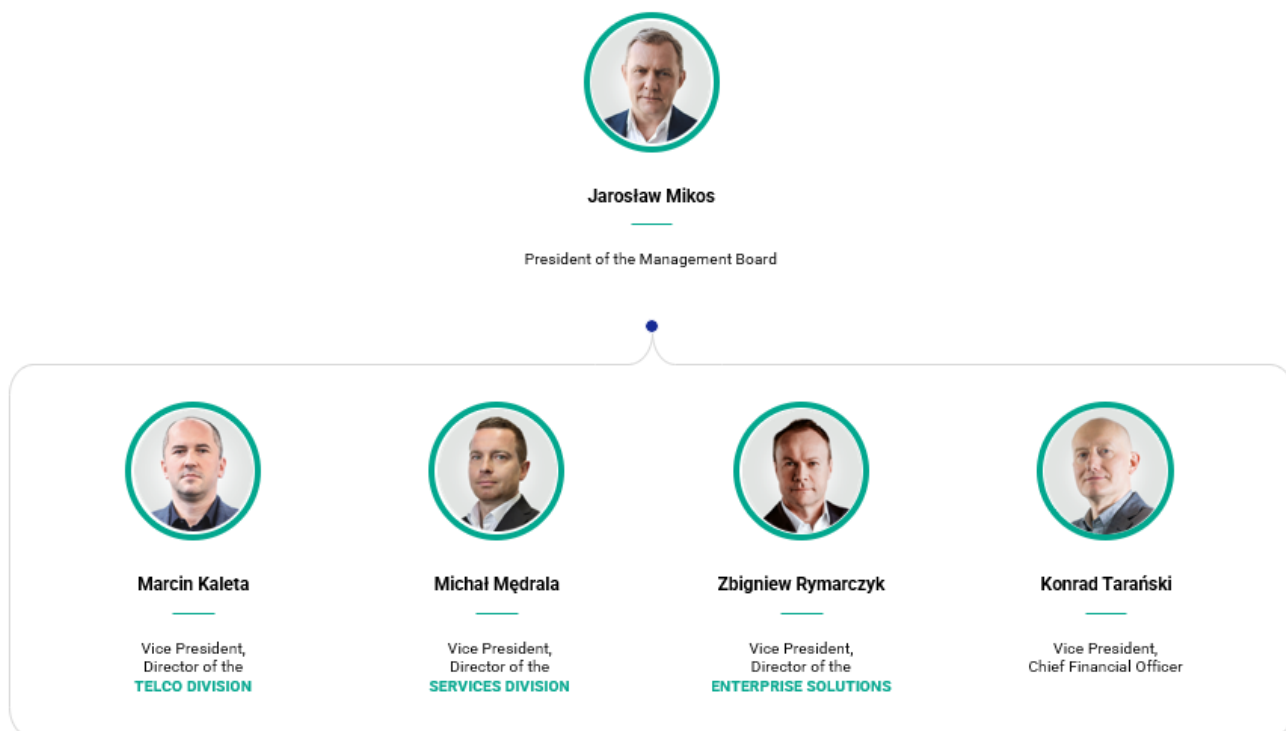
Mr Andrzej Pach (Professor of Technical Sciences, author of more than 250 scientific publications in the field of modelling and analysis of computer networks and radio networks, participant and manager of many research projects) has knowledge in the IT industry. He is an academic staff member at the Institute of Telecommunications AGH, which he headed from 1998 to 2016, and served as the Pro Vice-Chancellor for Science at AGH from 2016 to 2020. He is a member of the Committee on Electronics and Telecommunications of the Polish Academy of Sciences).

Management Board of Comarch S.A. as at 31 December 2024:

- Marcin Kaleta - Vice-President of the Management Board,
- Michał Mędrala - Vice-President of the Management Board,
- Andrzej Przewięźlikowski - Vice-President of the Management Board,

- Zbigniew Rymarczyk - Vice-President of the Management Board,
- Konrad Tarański - Vice-President of the Management Board.

Responsibility structure of **the Management Board of Comarch S.A.** - as at the date of the report:



Individual members of the Management Board coordinate the activities of Comarch S.A. and Comarch Group subsidiaries in Poland and abroad in the following areas:

Jarosław Mikos - Chairman of the Board, Head of the Financial Solutions Sector,

Konrad Tarański - Vice-President of the Management Board, Head of Finance and Sector Administration,

Marcin Kaleta - Vice-President of the Management Board, Telecommunications Sector Director,

Michał Mędrała - Vice-President of the Management Board, Head of the Services Sector,

Zbigniew Rymarczyk - Vice-President of the Management Board, Head of the Enterprise Solutions Sector.

At the time of writing, 100% of the members of the Management Board of Comarch S.A. were men. All members of the Management Board have many years of professional experience in the IT sector, gained through their work within the Comarch Group and some of them also outside its structures.

In Q4 2024, the Management Board of Comarch S.A. established an ESG Committee, whose role is to advise and support the Management Board in managing environmental, social responsibility and corporate governance issues. Konrad Taranski, Vice President of the Management Board, Finance Dissident, became a member of the Committee on behalf of the Management Board. The other members of the Committee represent the persons responsible for the area of sustainable development in the Comarch Group.

The ESG Committee also supports the Board of Directors in setting sustainability targets and monitoring progress towards them. The Committee meets at least once every six months, and more frequently if urgent issues arise.

The members of the Management Board have continuous access to sustainability expertise, including through collaboration with the Group's internal and external experts, participation in internal projects (e.g. materiality study) and attendance at external events. The acquired competences support the effective management of risks, opportunities and impacts, and ensure the ability to oversee the objectives and progress of the Group's sustainability strategy.

Detailed information presenting the experience and competences of the managing and supervising persons can be found on the Company's website <https://www.comarch.pl/o-firmie>.

In 2024, Comarch S.A.'s Board of Directors took note of key sustainability issues such as:

- legal requirements in the area of ESG,
- good practices and ESG initiatives,
- the Board's role in reporting on sustainability issues,
- expectations of customers and financial institutions.

The Board of Directors also reviewed the document Map of Risks and Opportunities - which includes, inter alia, identified sustainability risks and opportunities - as part of the Group-wide risk management process. The Board of Directors accepted the ongoing actions taken in response to the risks identified, approved the planned actions for the individual risks included in the document and adopted the current residual risk level for the remaining issues.

For more information on risk management, including ESG, see subsection GOV-5 of this sustainability report.

Representatives of the governing bodies of Comarch Group companies are citizens of different countries. The table below shows the structure of the management and supervisory bodies by diversity category in 2023 - 2024. The functions held as at 31 December are counted - one person may hold several functions.

Year	Governing body	Age	Female	Male	Total
31 December 2024	Supervisory Board	under 30 years of age	-	-	-
		30-50 years	4	13	17
		over 50 years	8	17	25
		Total	12	30	42
	Management Board	under 30 years of age	-	-	1
		30-50 years	12	81	93
		over 50 years	9	30	39
		Total	21	111	132
Total			33	141	174

Year	Governing body	Age	Female	Male	Total
31 December 2023	Supervisory Board	under 30 years of age	-	-	-
		30-50 years	12	12	24
		over 50 years	6	10	16
		Total	18	22	41
	Management Board	under 30 years of age	1	-	1
		30-50 years	13	94	107
		over 50 years	8	14	22
		Total	22	108	129
Total			40	130	170

2.2. Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

GOV-2

Information provided to the entity's administrative, management and supervisory bodies and the sustainability issues they undertake.

During the reporting period, sustainability issues were regularly discussed during statutory meetings by both the Management Board and the Supervisory Board of Comarch S.A. These bodies were acquainted with the current ESG activities implemented in the Comarch Group, including progress in implementing ESRS-compliant reporting obligations.

In order to support the process of identifying significant influences, risks and opportunities, a survey was conducted among Comarch S.A. Board members and the ESG Committee appointed by the Board. Its purpose was to identify key stakeholders and the results were used to develop a stakeholder map.

Sustainability issues are the responsibility of the Board Member acting as CFO on behalf of the Comarch S.A. Board of Directors, who is also a member of the ESG Committee. This Committee actively participated in the double materiality assessment process, supporting the identification of material issues both from the perspective of impact on the environment and financial significance for the Comarch Group.

The Management Board of Comarch S.A. approves risks and opportunities - including those related to sustainability - on an annual basis as part of the risk management process that operates at Group-wide level. This assessment also takes into account ESG risks and their potential impact on strategy and operations.

During the reporting period, the following risks and opportunities related to the ESG area, among others, were identified as significant:

Opportunity: the development and production of software to support companies in defining, monitoring and effectively reducing their carbon footprint;

Risks:

- increases in electricity prices and potential disruptions in electricity supply due to climate change,
- loss of staff with key knowledge,
- insufficient staff resources resulting in the risk of delays in project implementation.

Sustainability issues are also an integral part of the annual "Report on the functioning of the internal control, risk management and compliance system as well as the internal audit function in the Comarch Group", which is prepared by the Compliance and Internal Audit Department and submitted to the Comarch S.A. Supervisory Board. This report includes an assessment of the effectiveness of the above systems and references to ESG activities and processes, as well as significant risks and opportunities in this area.

The Board's activities in respect of significant IROs included the determination of acceptable risk levels, the selection of response strategies, including the approval of associated expenditure, and the oversight of the activities of risk owners.

Significant sustainability issues (impacts, risks and opportunities), which the Management Board or Supervisory Board dealt with during the reporting period included:

- Preparing for sustainability reporting in line with the new requirements, including adjusting internal processes and setting up an ESG Committee,
- energy and emissions issues, including investments in renewable energy sources (RES), the conclusion of RES power purchase contracts and the implementation of energy-efficient solutions,

- employment issues and personnel policy,
- cyber security and personal data protection issues,
- To approve the implementation of the updated whistleblowing procedure resulting from the entry into force of the Whistleblower Protection Act,
- Approve updates to the Code of Ethics and the Anti-Corruption Policy,
- approving donations to foundations and public sector entities.

Detailed information on expenditure and activities is provided in the chapters on each aspect of ESG.

2.3. Integration of sustainability-related performance in incentive schemes

GOV-3

The remuneration policy in force in 2024 provided for the possibility of granting variable remuneration to members of Comarch S.A.'s Management Board dependent on the achievement of specific financial and non-financial objectives. These objectives could include, among others, the Company's financial performance, human resources development, environmental protection or consideration of social interests. According to the Policy, detailed criteria are set annually by the Supervisory Board or the General Meeting in order to support the business strategy and long-term interests of the Company. The Supervisory Board evaluates the implementation of these criteria by the members of the Management Board. However, it should be noted that in the 2024 reporting period, the value of bonuses paid to members of the Executive Board was not linked to the achievement of sustainability indicators.

2.4. Statement on due diligence

GOV-4

In 2024, the Comarch Group continued to work on the implementation of its due diligence process, which includes the identification, assessment and management of negative impacts related to human rights and environmental impacts, throughout the Group's value chain. As part of this process, Comarch conducts activities to prevent, mitigate and monitor the effectiveness of potential negative impacts, in line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. In particular, this process covers the areas of supplier relationship management, compliance with environmental regulations, respect for human rights, among others.

CORE ELEMENTS OF DUE DILIGENCE	PARAGRAPHS IN THE SUSTAINABILITY STATEMENT
Embedding due diligence in governance, strategy and business model	GOV-2 SBM-3
Engaging with affected stakeholders in all key steps of the due diligence	SBM-2 IRO-1 S1-2 S1-3
Identifying and assessing adverse impacts	SBM-3 IRO-1
Taking actions to address those adverse impacts	E1-3 E5-2
Tracking the effectiveness of these efforts and communicating	E1-5 E1-6 E5-4 E5-5 S1-9 S1-16 S1-17

2.5. Risk management and internal controls over sustainability reporting

GOV-5

The process of identifying and assessing risks, including those related to sustainability reporting, is integrated into the company-wide risk management system in place in the Comarch Group, the principles of which are set out in the Risk Management Policy and the accompanying Risk Management Procedure.

Risk management in the Comarch Group is implemented as a cyclical process that includes the following stages:

- Risk assessment - the identification and assessment of potential risks and opportunities, taking into account the impact of realising the risk and the likelihood of its occurrence. Priority is given to those risks that score highly in this assessment and could materially affect performance, reputation or regulatory compliance, including sustainability reporting.
- Dealing with risks - identifying risk management mechanisms and response strategies (e.g. avoidance, minimisation, risk acceptance),
- Control and reporting - monitoring risks and providing management and reporting information,
- Subsequent iterations of the process - regular updates and review of risks in light of changing internal and external circumstances.

The Head of the Compliance and Internal Audit Department is responsible for initiating and coordinating the risk management process. His tasks include, among others, collecting and updating risk data on a cyclical basis, at least once a year, and submitting it to the Comarch S.A. Management Board in the form of a Risk Map and Opportunity Map, taking into account both risks and opportunities identified in the Comarch Group. This assessment also includes issues related to ESG risks and opportunities. Monitoring of the implementation of risk management mechanisms takes place once every six months.

Risk owners, i.e. managers of organisational units, are responsible for the day-to-day management of risks in the areas they manage.

The Management Board of Comarch S.A. plays a key role in the risk management process, being responsible for:

- determining the levels of risk acceptable to the organisation,
- choice of risk response strategy,
- overseeing the activities of risk owners.

With regard to the system of internal control and risk management over the sustainability reporting process, the Comarch Group relies on principles analogous to those used for financial reporting.

The Comarch Group, although it does not have a formalised procedure for the preparation and approval of the sustainability report, applies well-established internal practices in this respect to ensure the consistency and compliance of the process with the applicable regulations. Business events are recorded in integrated financial, accounting and HR systems with built-in access control mechanisms to ensure data security.

The preparation of the sustainability report is handled by teams of specialists from, among others, the ESG, compliance, HR, quality, accounting, controlling and finance departments, under the supervision of the Chief Financial Officer. The Comarch Group Sustainability Report 2024 was subject to voluntary attestation providing limited assurance by an independent auditor.

The main risks identified in the area of sustainability reporting include:

- lack of completeness or consistency of non-financial data,
- human error in information gathering and processing,
- risks arising from the complexity of the organisational structure and the diversity of reporting systems,
- incorrect estimates when calculating indicators, e.g. carbon footprint,
- limited access to or delays in making value chain data available.

In order to mitigate the above risks, the following measures are used: access controls in IT systems, multi-stage data verification by expert teams, assignment of data owners and internal approval paths.

3. Strategy

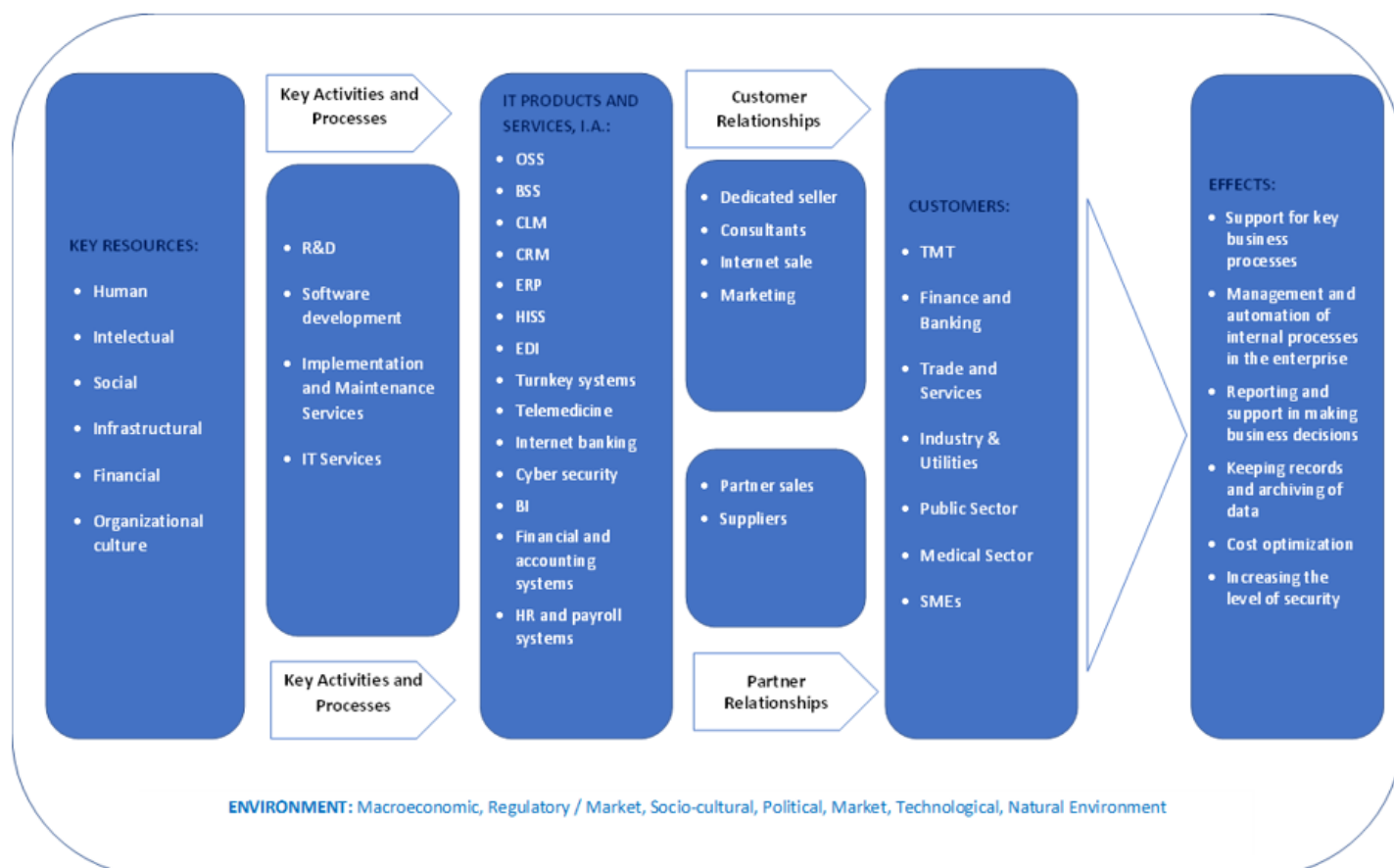
3.1. Strategy, business model and value chain

SBM-1

The Comarch Group, whose parent company is Comarch S.A. with its seat in Kraków, is active in the area of design, implementation and maintenance of IT solutions, classified under PKD 62.01.Z. Its business model is based mainly on the provision of its own IT products as well as implementation and maintenance services in the licence and service (SaaS) model. The Group's offer includes, among others, ERP systems, CRM, financial and accounting systems, loyalty and billing solutions, electronic banking systems, BI tools, security and network infrastructure management systems, and software for the healthcare and public administration sectors.



The Comarch Group operates globally with 58 companies in 30 countries, on 6 continents, in 71 cities. Comarch's clients include entities from the telecommunications, financial, FMCG, industrial, public administration, education, healthcare and e-commerce sectors. The Group provides services to both large organisations and SMEs. Operations are supported by geographically dispersed data centres (e.g. in Poland, Germany, France and the USA), as well as Comarch Cloud infrastructure, providing a secure and scalable IT environment.



The number of employees by geographical area is shown below.

Country	Number of employees
	2024
Saudi Arabia	8
Australia	-
Austria	11
Belgium	28
Brazil	10
Chile	1
France	131
Netherlands	3
Indonesia	3
Japan	7
Colombia	1
South Korea	2
Luxembourg	1
Malta	4
Germany	212
Panama	4
Poland	4 759
Russia	1
United States of America	45
Switzerland	25
Thailand	61
Turkey	3
Ukraine	34
United Kingdom	14
Italy	12
United Arab Emirates	18
Total employees	5 398

The breakdown of total revenue is presented in Note 3.2 *Reporting by Segment* of the Consolidated Financial Statements.

The entity is not active in the fossil fuels, chemicals production, controversial weapons production (cluster munitions, anti-personnel mines, chemical and biological weapons and nuclear weapons), tobacco cultivation and production sectors.

The Comarch Group conducted a benchmarking assessment of companies in the IT sector. The aim of this assessment was to identify and assess the key aspects of sustainability affecting the operation of the companies surveyed, as well as to identify common areas of risk, opportunity and impact typical of the sector.

The results of the assessment carried out provided one important source of input to the process of identifying the Comarch Group's actual and potential impacts, risks and opportunities (IROs). It was shown that the main thematic units identified within the IT sector overlap with the Group's IROs described in subsection SBM-3, including in terms of their potential links to the Group's own business model or value chain. This applies in

particular to topics such as cyber security and data protection, energy consumption of IT infrastructure and the impact on climate change, working conditions, doing business and product development to support customer sustainability.

Alignment of model and strategy with sustainability impacts, risks and opportunities

In 2022, a strategy was approved by the Management Board of Comarch S.A., setting the goals and main directions of activities in the area of ESG and sustainable development of the Comarch Group companies. The Sustainability Strategy sets out the main objectives to be implemented over the next 5 years:

- reducing CO₂ emissions per employee by 20% by 2027 (compared to 2021),
- increasing the share of energy from own renewable sources to 20% of total consumption by 2027,
- carrying out continuous activities leading to increased energy efficiency,
- Continuously improving working conditions and enhancing staff development opportunities,
- supporting diversity and equality, inter alia, through support for the professional development of the organisation's female workforce: steadily increasing the proportion of female employees and achieving a share of women in management positions that is commensurate with the proportion of women in the total workforce,
- effective implementation of an anti-bullying policy defining bullying behaviour and providing for a whistleblowing procedure,
- looking after important social interests through dialogue with local communities, supporting sport and promoting healthy lifestyles, taking initiatives in the field of culture and education, popularising science,
- providing material aid to the needy and supporting charitable causes,
- reinforcing an ethical organisational culture through information campaigns and training on ethics and compliance within the company,
- improving the functioning of systems, including: compliance management, risk management, internal control,
- working towards sustainability with customers and suppliers, including through a commitment to ethics, respecting working conditions and meeting social and environmental criteria,
- Maintaining dialogue with all stakeholders, including the provision of accurate, timely and reliable information on non-financial data, including consideration of the TCFD's recommendations for reporting on climate issues.

The full document is available at: <https://www.comarch.pl/relacje-inwestorskie/lad-korporacyjny/>.

The Comarch Group offers IT products and services that support the achievement of sustainable development goals - both in its own operations and those of its customers. Solutions such as Comarch Cloud, ERP, BI or EDI systems contribute to reducing energy and resource consumption and improving the operational efficiency of customers.

The Comarch Group also supports clients in complying with the growing regulatory requirements in the ESG area (e.g. CSRD, EU Taxonomy) by providing tools that enable the collection, analysis and reporting of non-financial data. In addition, by developing solutions to support the digitisation of public and health services and improving data security, the company also supports social and corporate governance objectives.

Comarch's offering responds to the needs of different customer groups - from government and the health sector, to industry and finance, to SMEs - by integrating environmental, social and corporate governance objectives. In this way, the Group strengthens its positive impact and develops tools to support customers in their ESG transformation.

Business model

The Comarch Group's business model is based on technological inputs and significant investment in human capital. A key resource is intellectual capital, the development of which is a strategic priority. In 2024, PLN 409.6 million was allocated to research and development activities, which accounted for 21% of the Comarch Group's sales revenue. These investments support the development of innovative products in line with sustainable development goals and strengthen the Group's position as a provider of modern and secure IT solutions.

The Group has consistently pursued a strategy based on:

- the development and sale of IT solutions based predominantly on its own products,
- focus on the Comarch Group's key business segments,
- the development of sales in foreign markets, particularly in Western Europe (especially the DACH region), North America and Asia,
- continuously improving the operational efficiency of the business by improving procedures and rationalising costs,
- developing further business areas, especially in e-commerce services, loyalty solutions and financial market services,
- promoting a service-based IT sales model, especially solutions based on Comarch Cloud technology,
- investments in its own technologies and IT infrastructure, also outside Poland.

The Group has its own IT infrastructure, including data centres in Poland, Germany, France and the US, which ensures operational independence and control over environmental impacts. In 2023, a new server room was commissioned in Mesa (Arizona), which was located in a region with a low energy carbon footprint and stable energy access. These investments are in response to global growth in demand for cloud services and increased customer sensitivity to climate issues.

The Comarch Group provides customers with innovative and secure IT solutions that support their digital transformation, increase efficiency and help them achieve their sustainability goals. Investors benefit from the Group's stable financial position, strong research and development facilities and growing presence on international markets. To its employees and partners, Comarch offers competence development, safe working conditions and social commitment, thereby fulfilling its economic goals and social responsibility.

Value chain

The Comarch Group's value chains were created based on Michael Porter's value chain model, focusing on key operational processes and supporting activities. The core part of the value chain is the operational processes in the Comarch Group, i.e. all the key processes involved in creating value for the customer. In the Comarch Group, research and development is of particular importance in this area, enabling the continuous improvement of products and services. Then, in software development, the Group focuses on developing modern IT solutions that meet market needs. Implementation and maintenance services ensure the smooth implementation of products and their subsequent support, while the provision of IT services guarantees comprehensive customer service in terms of IT technology and infrastructure.

The Comarch Group's employees also play a key role in creating customer value - their knowledge, competence and commitment are the foundation of the quality of the products and services provided.

Ancillary activities, in turn, support the core processes and are necessary to ensure the smooth functioning of the entire organisation. In this area, administrative processes, human resources management and health and safety care play a key role. Training, finance, accounting and controlling are essential to maintain operational efficiency, and, legal services, internal IT support and marketing and advertising activities support the company's image and market development.

In the Comarch Group's value chain, inbound logistics is identified with upstream, encompassing all relationships, processes and activities related to the acquisition of input resources into the organisation. A key role in this area is played by the various suppliers on whom the successful implementation of the company's core activities depends.

These include technology infrastructure providers, supplying electronic hardware and servers, and technology solution providers, responsible for software, licences and tools to support software processes. External service providers, such as consultancy services, telecommunications or media supply, are also an important group. Energy suppliers, who ensure the stability and continuity of the company's technological and operational infrastructure, also occupy an important place.

The Comarch Group has a wide range of products and services, for the realisation of which it is necessary to cooperate with suppliers complementing the portfolio of own services and licences and allowing the offer to be extended with third-party products.

The third-party product portfolio consists mainly of internationally recognised brands and manufacturers. The cooperation is mainly carried out through local authorised distribution, helping to solve logistical problems and organise fast delivery for the customer.

Downstream in the Comarch Group value chain refers to activities that are related to the end of life of products and customer relationships. In this area, the Group focuses on the delivery of its products and services to specific customer groups, as well as on the processes that occur after the products have reached the end of their useful life.

In addition to the main IT value chain, detailed in this disclosure, the Comarch Group also identifies three additional value chains: in the sports, medical and investment segments, which are outlined below.

VALUE CHAIN – IT SEGMENT

Identified the stakeholders interacting with the value chain processes

Suppliers of goods and services			Comarch Group employees, investors, strategic partners			Customers, end users	
Upstream			GROUP OPERATIONS			Downstream	
Suppliers (Tier 3)	Suppliers (Tier 2)	Suppliers (Tier 1)	Key resources			Customers	End of life
Suppliers of primary raw materials that are used to manufacture components or other elements for the production of electronic equipment.	Direct component and service suppliers who provide key components for the assembly and production of electronic equipment.	Infrastructure hardware providers <ul style="list-style-type: none"> • electronic equipment • servers 	<ul style="list-style-type: none"> • Human • Intellectual 	<ul style="list-style-type: none"> • Social • Infrastructure 	<ul style="list-style-type: none"> • Financial • Organisational culture 	<ul style="list-style-type: none"> • Telecommunications • Finance and Banking • Trade and services • Industry and utilities • Public administration • Medicine • SMEs 	<ul style="list-style-type: none"> • IT equipment and office supplies (computers and peripherals) • Office waste
Primary raw materials: <ul style="list-style-type: none"> • metals and rare earths • carbonaceous materials • technical gases Recycled raw materials: <ul style="list-style-type: none"> • plastics and polymers • glass and ceramics Energy raw materials: <ul style="list-style-type: none"> • gas • electricity • vehicle fuels 	<ul style="list-style-type: none"> • Direct suppliers of components and services <ul style="list-style-type: none"> ◦ suppliers of finished components and parts ◦ suppliers of mass production of electronic components ◦ suppliers of computer accessories • Suppliers of consumables and technology <ul style="list-style-type: none"> ◦ Suppliers of electronics and advanced technology ◦ Suppliers of office supplies and operational services 	Technology solution providers <ul style="list-style-type: none"> • software • licences • software tools External service providers IT infrastructure <ul style="list-style-type: none"> • consulting services • telecommunications • media Energy suppliers	Primary activities Research and development Software development Implementation and maintenance services Provision of IT services	Support activities Administration HR Quality and health & safety Training Finance, accounting, controlling Investor relations Legal and compliance Internal IT support	Marketing & Sales CUSTOMER RELATIONS: <ul style="list-style-type: none"> • Dedicated salespeople • Consultants • Internet sales • Marketing PARTNER RELATIONS: <ul style="list-style-type: none"> • Partner sales network • Suppliers 	End users	
			Waste				
			<ul style="list-style-type: none"> • Waste associated with employee housing • Waste from production hall operations 			<ul style="list-style-type: none"> • Employees of customers • Unidentified users of IT solutions (e.g. beneficiaries of loyalty programmes) 	

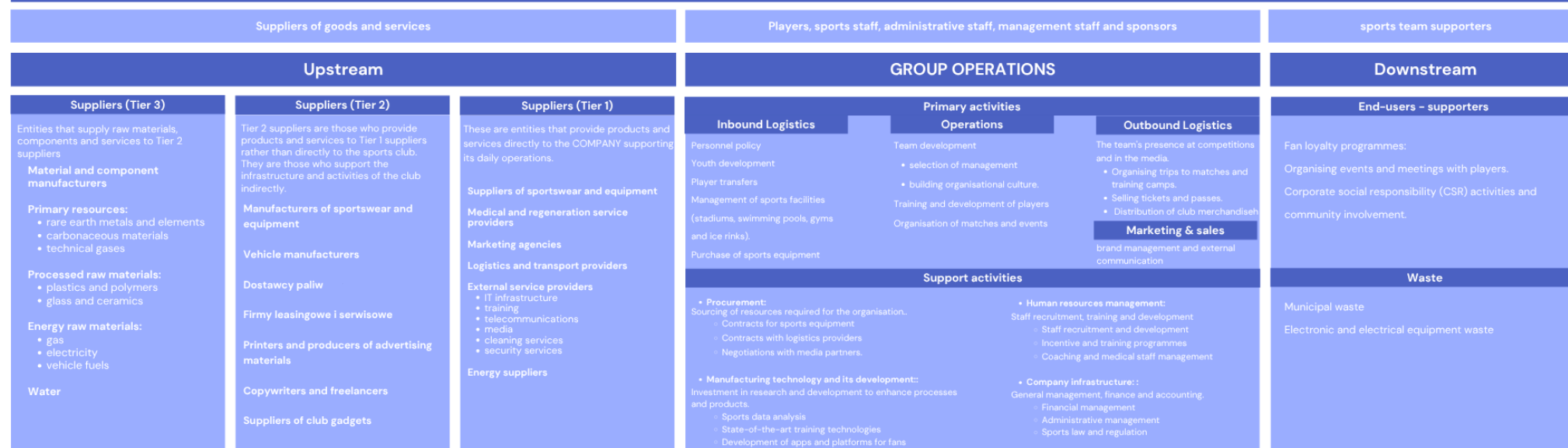
VALUE CHAIN – INVESTMENT SEGMENT

Identified the stakeholders who interact with the value chain processes

Suppliers of goods and services			Comarch Group employees, investors, strategic partner			Consumers, social environment and local communities	
Upstream			GROUP OPERATIONS			Downstream	
Dostawcy (Tier 3)	Dostawcy (Tier 2)	Dostawcy (Tier 1)	Key resources			Customers	Waste
Entities that provide raw materials, components and services to Tier 2 suppliers	Tier 2 suppliers who provide products and services to Tier 1 suppliers rather than directly to the organisation. They are the entities that support the infrastructure and operations of the pre-enterprise.	Entities that provide products and services directly to the Group supporting its daily operations.	<ul style="list-style-type: none"> • Human and intellectual 	<ul style="list-style-type: none"> • Social 	<ul style="list-style-type: none"> • Financial 	private home buyers	municipal waste
Suppliers of raw materials (e.g. mines, industrial forests)			Primary activities			office tenants	construction and demolition
Primary raw materials: <ul style="list-style-type: none"> • metals and rare earths • carbonaceous materials • technical gases Processed raw materials: <ul style="list-style-type: none"> • plastics and polymers • glass and ceramics Energy raw materials: <ul style="list-style-type: none"> • gas • electricity • vehicle fuels 	Suppliers of raw materials (e.g. mines, industrial forests)	Plot vendors (companies and individuals)	Real estate investments <ul style="list-style-type: none"> • Property market research (analysis of potential locations, trends and market values) • Property acquisition (acquisition of land or commercial and residential properties) • Property management (leasing, maintenance and upgrading) 	Real estate development activities <ul style="list-style-type: none"> • Land and property acquisition (identification of building plots, purchase of land for development) • Planning and design (preparation of construction projects, obtaining building permits) • Construction and implementation of development projects (management of the construction process, quality supervision) • Real estate sales and rentals 		retail tenants	waste
	Producers of building materials (e.g. cement works, timber companies, brickyards)	Design and planning service providers (architectural studios, experts)	Support activities			agents and brokers acting on behalf of prospective tenants or purchasers	hazardous waste
	Suppliers of components and products (e.g. concrete and steel elements, windows, bricks)	Providers of construction services (larger and smaller general construction and specialist companies)	Human resource management	Financial management	Risk management	End users	
		Providers of specialised services (marketing, analysis, building maintenance)	Occupational health and safety	Quality management	Legal services		
		Transport service providers				<ul style="list-style-type: none"> • Employees of tenants of office space 	
		Utility providers				<ul style="list-style-type: none"> • Housing buyers 	
		Energy suppliers					

VALUE CHAIN – SPORT SEGMENT

Identified the stakeholders who interact with the value chain processes



VALUE CHAIN – MEDICAL SEGMENT

Identified the stakeholders interacting with the value chain processes



3.2. Interests and views of stakeholders

SBM-2

The Comarch Group's key stakeholders were identified on the basis of a survey of Comarch S.A. Board members, the ESG Committee and representatives of the Human Resources Department. In addition, the environment was identified as a key stakeholder by default, due to the fact that it is clearly identified in the ESG strategy of the Comarch Group as one of the three main pillars of corporate responsibility - alongside social responsibility and corporate governance.

The study assessed two aspects relating to 12 stakeholder groups:

- The extent of the Comarch Group's influence on stakeholders,
- The degree of stakeholder influence on the Comarch Group.

Comarch Group's key stakeholders include:

Employees (full-time employees and associates, interns, apprentices, students and potential employees, employees of subcontractors and suppliers, labour inspection and other similar supervisory bodies),

Investors (shareholders, institutional investors, individual investors, Warsaw Stock Exchange, brokerage houses, banks, KNF, NDS, SEG),

Clients (including, institutional clients, individual clients, local government administration and government administration),

Suppliers and subcontractors (including, external consultants and IT specialists, hardware and software infrastructure providers, electricity and telecommunications providers),

Governmental and regulatory organisations (national and international legislative bodies and supervisory institutions),

Strategic partners (fall into the other stakeholder categories, depending on the nature of the cooperation, Comarch ERP partner network, technology partners),

Environment (including the state of the environment, i.e. air quality, water quality, soil quality, state of ecosystems and biodiversity, level of greenhouse gas emissions, climate change),

End users (including, communities of users of Comarch solutions (often one-person businesses), customer employees, loyalty programme beneficiaries, clinic patients, fans) were identified as a stakeholder group with **indirect contact with the Comarch Group**,

*Due to the business model based on the sale of products and services in a B2B (business-to-business) relationship and the marginal scope of providing services to individuals, **end users were not considered key stakeholders of the Comarch Group.***

The Comarch Group is aware of the importance of stakeholder involvement in its activities and therefore conducts regular dialogue with all key stakeholder groups. In the Comarch Group, the opinions and interests of stakeholders in terms of sustainability impacts are communicated to administrative, management and supervisory bodies through the units responsible for ongoing dialogue with these groups. This includes departments responsible for relations with customers, employees, business partners or investors.

For example, customer satisfaction survey reports and other cyclical analyses of stakeholder relations are presented to senior management and the Board of Directors, enabling this information to be taken into account in strategic and operational decisions.

The way in which stakeholders belonging to the different groups will be involved and the objectives of the dialogue with them are outlined below.

Employees: recruitments, periodic interviews, internal meetings, internal communication (mailings, internal portals and instant messaging for employees), breach notification channels implemented - announced by email and available on the intranet,

Dialogue objective: to build a satisfying and stable working environment by better matching employees' expectations, supporting their development and reducing turnover.

Investors: regular meetings during results conferences in Kraków or Warsaw (also interactive on-line transmissions and video recordings), individual meetings and teleconferences with the Company's Management Board, ongoing cooperation with the Capital Market and Insurance Department, Investor Relations website, participation in conferences organised by financial and capital market institutions such as banks, investment funds, the WSE, the NDS, the FSA and the SEG,

Purpose of the dialogue: to ensure information transparency, to meet the information needs of stakeholders, to build Comarch's values, to care for Comarch's reputation.

Clients: website, customer satisfaction survey, business meetings for the implementation of contracts and improvement of the quality of services provided, organising and supporting the functioning of a community of users of Comarch solutions, e.g. in the form of cyclical meetings (including the annual Comarch User Group) or maintaining pages dedicated to Comarch solutions on social networking sites,

Purpose of dialogue: to explore customer expectations and opinions, to incorporate the voice of the customer into the design of business solutions, to create products and services tailored to the customer's needs.

Suppliers and subcontractors: surveys sent to supplier, business meetings for contract implementation,

Dialogue objective: partnership with suppliers, proactive communication with suppliers and subcontractors, ensuring compliance with applicable legal regulations and internal ethical principles, support in aligning with sustainability principles.

Government and regulatory organisations: identification of legal developments and standards, active participation in legislative and regulatory processes,

Purpose of the dialogue: to ensure that the business complies with applicable laws, industry regulations and sustainability standards, building transparent and constructive relationships with regulators, government authorities and international organisations.

Strategic partners: partner meetings (offline and online), dedicated partner training and workshops, partner conferences, individual partner pages.

Purpose of the dialogue: building long-term business partnerships, strengthening the competence and commitment of partners in selling and implementing Comarch solutions, adapting Comarch solutions to

changing market needs thanks to feedback from partners, providing partners with up-to-date technological and business knowledge.

Environment: liaising with utility suppliers, energy producers, environmental organisations and recycling companies, monitoring the environmental impact of operations by analysing CO₂ emissions, energy consumption, water consumption and the amount of waste generated, analysing available scientific studies and reports, including climate reports.

Dialogue objective: to improve the quality of the environment, reduce energy consumption, pollutant emissions reduce waste generation.

Although end users and local communities are not a significant stakeholder group, the Comarch Group maintains a dialogue with them through:

Local communities: ongoing direct communication, implementation of sponsorship projects, building partnerships, implementation of joint projects, organisation of health education and prevention programmes, ongoing contact with the media (by telephone, e-mail, during conferences and press briefings), organisation of internship programmes,

Dialogue objective: to be socially responsible, to support community development, to ensure information transparency, to support students and graduates in gaining knowledge and experience, to ensure compliance with requirements and regulations, to create jobs.

End Users: Unique Comarch ERP Community - Ask, Help, Improve, contact forms available on the website, patient satisfaction surveys at the iMed24 medical centre,

The aim of the dialogue: to understand the needs, expectations and satisfaction levels of the products offered, to build long-term, positive relationships with end users, to support the effective and secure use of the solutions offered, to ensure end user satisfaction and loyalty.

An example of stakeholder engagement in the Comarch Group is the Unique Comarch ERP Community - Ask, Help, Improve. Comarch ERP Community (www.Spolecznosc.Comarch.pl) is a platform where Comarch ERP Clients help each other by exchanging knowledge about Comarch ERP systems, as well as submit ideas for the development of these systems. All submitted ideas can be commented on and evaluated by members of the Community, the highest rated ones are analysed by Comarch for implementation. Comarch Partners are also active on the Community, supporting customers with their knowledge and experience and also submitting ideas for software development. Comarch employees also participate in the discussions.

The project is a unique venture - not only does it allow, like a traditional forum, for the exchange of knowledge, but it also gives customers the opportunity to influence the development of the products they use every day. This is also appreciated by entrepreneurs looking for software, for whom the platform is open. They can already contact Comarch system users at the stage of choosing a business management system, ask questions, clarify doubts, read all the discussions.

Community participants are further activated through the use of gamification elements, allowing competition between users, the acquisition of badges and competences. The community is alive, there is not a day that goes by without new users, questions and ideas appearing on it. On the platform's homepage, you can follow the current statistics, which at the end of March 2025 are as follows:

- 18 225 questions asked

- 46,307 responses
- 17,572 comments

3,631 ideas for new functionalities and the improvement of existing ones, of which more than 524 were realised by Comarch.

S1.SBM-2

In the Comarch Group, its own employee resources are one of the key stakeholder groups directly influenced by the Comarch Group and whose interests, views and human rights are taken into account when shaping the strategy and business model. The Group's strategy is based on the premise that long-term growth and market competitiveness are closely linked to the quality of the working environment, the commitment of teams and respect for human rights. Accordingly, the business model incorporates measures to reduce negative impacts on employees, such as addressing inequalities, promoting diversity, ensuring safety and well-being and supporting professional development.

The views of employees and their representatives are taken into account through social dialogue, periodic satisfaction and engagement surveys, onboarding and exit interview processes, as well as through the operation of grievance and feedback channels. The information obtained through these channels influences the design of HR policies, development programmes and work-life balance initiatives.

S3.SBM-2

The interests of local communities influence the Comarch Group's business model through the implementation of charitable, educational, sporting and cultural activities. These activities strengthen community relations, brand reputation and local acceptance of the business.

3.3. Material impacts, risks and opportunities and their interaction with strategy and business model

SBM-3

The Comarch Group has identified key areas of impact, risks and opportunities through a double materiality assessment process, taking into account the business context, stakeholder expectations and the evolving regulatory environment (including the requirements of the CSRD and ESRS standards).

Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Link to strategy and business model	Impact/ Risk/ Opportunity	Type of impact / Time horizon	[S] Current and anticipated impacts / [D] Actions taken
Climate change	Climate change mitigation		<p>Greenhouse gas emissions generated along the full value chain, which includes own activities, i.e. software production as well as the activities of suppliers, including hardware manufacturers and their subcontractors, energy production and supply, employee travel and customer use of products.</p> <p>Impact on people or the environment: Greenhouse gas emissions contribute to climate change, leading to, among other things, rising temperatures, extreme weather events and ecosystem degradation. These phenomena negatively affect human health and safety, access to natural resources and the living conditions of communities around the world.</p>	Own operations, Upstream Downstream	Direct link to strategy And the business model	Impact	Negative, actual/ -	<p>[S] Increasing concentrations of greenhouse gases in the atmosphere leading to a warming climate and an increase in extreme events such as heat waves, droughts, floods and storms.</p> <p>[D] Calculation of the Group's carbon footprint, implementation of planned investments aimed at reducing emissions.</p>
			<p>Production of software to support companies in determining their carbon footprint and monitoring and effectively reducing it.</p>	Own operations	-	Opportunity	- / short, medium, long term	<p>[S] Strengthening market position through customer growth. Building the company's image as working to mitigate the climate crisis.</p> <p>[D] Market needs analysis.</p>
	Energy		<p>Electricity consumption related to the operation of office buildings, technical infrastructure and maintenance of servers.</p> <p>Impact on people or the environment: The consumption of electricity for our own operations generates a significant environmental impact through greenhouse gas emissions from its production and the exploitation of natural resources.</p>	Own operations	Direct link to strategy And the business model	Impact	Negative, actual/ -	<p>[S] Environmental pollution associated with electricity production, depletion of non-renewable energy resources.</p> <p>[D] In Group companies, investments in RES, purchase of energy with guarantee of origin from RES.</p>
			<p>Increase in electricity prices due to rising temperatures resulting from ongoing climate change (more energy required for cooling), as well as decreasing availability of energy resources.</p>	Own operations	-	Risks	- / short-term	<p>[S] Increase in operating costs, particularly related to the operation of data centres and IT infrastructure, the need to adapt energy management strategies and the potential transfer of some costs to customers.</p> <p>[D] Investments in RES. Upgrading lighting to more energy-efficient lighting in selected locations.</p>
			<p>Changes in the voltage of the electricity network, power failures, power cuts or total lack of access to electricity. Climate change is having a significant impact on electricity networks, increasing the risk of blackouts, power outages and even complete lack of access to electricity in some regions. This impact is due to the more frequent occurrence of extreme weather events and their impact on energy infrastructure.</p>	Own operations	-	Risks	- / long-term	<p>[S] Disruption to IT and cloud services, reduced availability of critical systems, increased operational costs associated with maintaining emergency infrastructure and potential degradation of customer service.</p> <p>[D] Investment in own RES</p>

			Description of impact / Impact on people or environment	Place of impact in the value chain	Link to strategy and business model	Impact/ Risk/ Opportunity	Type of impact / Time horizon	[S] Current and anticipated impacts / [D] Actions taken
Topic	Sub-topic	Sub-sub-topics						
			Lack of access to energy resources	Own operations, Upstream	Direct link to strategy And the business model	Risks	- / long-term	[S] Increasing electricity prices. [D] Investment in own RES
			Moderate cost reduction through partial use of RES	Own operations	Direct link to strategy And the business model	Opportunity	- / long-term	[S] Gradually reduce operating expenses related to energy purchases, increase cost stability over the long term and reduce the risks associated with fluctuations in conventional energy prices. [D] Investment in own RES
Circular economy	Resources inflows, including resource use		The production of electronic equipment results in the intensive exploitation of natural resources, particularly metals, minerals and water, contributing to their depletion and increased pressure on environmental supply systems. <u>Impact on people or the environment:</u> The intensive use of raw materials and materials of natural origin, including rare earths, by actors in the value chain leads to overexploitation of scarce natural resources, environmental degradation and increased emissions.	Upstream	Direct link to strategy And the business model	Impact	Negative, actual/ -	[S] Depletion of natural resources leading to increased raw material costs, disruption of supply chains and increased operational risks. [D] Supplier analysis. Carry out an analysis of the supply chain structure from the perspective of identifying suppliers particularly exposed to risks related to the limited availability of natural resources. Verify environmental practices and raw material management strategies of key suppliers, implement due diligence and diversify sources of supply to minimise the risk of disruption.
	Waste		Generation of waste in own operations (especially electronic waste) and throughout the value chain. <u>Impact on people or the environment:</u> In-house and value chain processes result in the generation of a variety of waste streams. This results in a negative impact on the environment through soil, water and air pollution, increased pressure on waste storage systems and emissions associated with waste transport and processing.	Own operations, Upstream Downstream	Direct link to strategy And the business model	Impact	Negative, actual/ -	[S] Environmental pollution by waste. [D] Adapt operational and waste management processes to increasingly stringent regulations, including EU waste management legislation. Conduct selective waste collection, work with certified collectors, digitally monitor waste streams.
Own workforce	Working conditions	Secure employment	Creating quality jobs and providing employees with stable and secure employment conditions. Offering a safe and stable workplace has a positive impact on the quality of life of employees by providing them with a sense of job security. <u>Impact on people or the environment:</u>	Own operations	Direct link to strategy And the business model	Impact	Positive, actual/ -	[S] Increasing employee motivation and engagement. [D] Implementation of the business strategy through HR Policy, Work Regulations, Remote Working Regulations, Code of Ethics.

Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Link to strategy and business model	Impact/ Risk/ Opportunity	Type of impact / Time horizon	[S] Current and anticipated impacts / [D] Actions taken
			The creation of quality jobs and the provision of stable and secure employment conditions for employees has a positive impact on the quality of life of employees, providing them with a sense of job security.					
			Loss of employees with key knowledge. Risks associated with salary pressures, staff shortages and loss of key staff.	Own operations	-	Risks	- / short, medium, long term	<p>[S] Reduction in a company's ability to execute strategic projects, implement new solutions and maintain its competitive position in the market. These risks can arise from various factors, such as demographic changes, intense competition for talent in the labour market or inappropriate HR management strategies.</p> <p>[D] Ensure quality workplaces and provide employees with stable and secure employment conditions. Implement the business strategy through the HR Policy, Work Regulations, Remote Working Regulations, Code of Ethics.</p>
			Insufficient staff resources leading to delays in project implementation.	Own operations	-	Risks	- / short, medium, long term	<p>[S] Loss of reputation, supply chain disruption, potential legal conflicts.</p> <p>[D] Ensure quality workplaces and provide employees with stable and secure employment conditions. Implement the business strategy through the HR Policy, Work Regulations, Remote Working Regulations, Code of Ethics.</p>
		Working time	<p>Applying transparent and employee-friendly working time arrangements, offering flexible employment models, including the possibility of hybrid working.</p> <p><u>Impact on people or the environment:</u></p> <p>There is a positive impact on employee wellbeing and work-life balance, resulting in higher levels of engagement and job satisfaction. In addition, reducing daily commuting to the office has an impact on reducing emissions from transport, which supports the organisation's climate goals.</p>	Own operations	Direct link to strategy And the business model	Impact	Positive, actual/ -	<p>[S] Increase in work efficiency, perception of Comarch Group as an attractive employer for future and current employees.</p> <p>[D] Implementation of business strategy through Working Regulations, Remote working Regulations.</p>

Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Link to strategy and business model	Impact/ Risk/ Opportunity	Type of impact / Time horizon	[S] Current and anticipated impacts / [D] Actions taken
		Adequate wages	<p>The remuneration system in the Comarch Group is adapted to market conditions and the current economic situation.</p> <p>Impact on people or the environment: Positive impact on job satisfaction, employee loyalty and retention.</p>	Own operations	Direct link to strategy And the business model	Impact	Positive actual/ -	<p>[S] Perception of Comarch Group as an attractive employer, reduction of employee turnover.</p> <p>[D] Implementation of the business strategy through the Personnel Policy and the Remuneration Regulations.</p>
		Social dialogue	<p>Incorporating employee perspectives in shaping internal policies and the working environment.</p> <p>Impact on people or the environment: Positive impact on job satisfaction, employee loyalty and retention.</p>	Own operations	Direct link to strategy And the business model	Impact	Positive, actual/ -	<p>[S] Increased commitment and sense of empowerment, increased attachment to the Group as an employer, reduced employee turnover</p> <p>[D] Including the employees' perspective in the process of shaping selected internal policies and designing the work environment. Implementation of tasks resulting from the dialogue.</p>
		Work-life balance	<p>Practices that support employees' work-life balance, flexible working hours and the possibility to work remotely to support work-life balance.</p> <p>Impact on people or the environment: Positive effects on employees' psycho-physical well-being, increased job satisfaction and reduced levels of stress and burnout.</p>	Own operations	Direct link to strategy And the business model	Impact	Positive, actual/ -	<p>[S] Increase employee satisfaction and loyalty, reduce staff turnover, improve psychological wellbeing and increase work efficiency.</p> <p>[D] Enabling work in a hybrid model. Create a formal framework through the Remote Working Regulations.</p>
		Health and safety	<p>Comarch, being aware that office work requires proper workstation ergonomics and stress management, influences its employees through appropriate health and safety policies and training in ergonomic work, and has implemented the PN-EN ISO 45001 standard.</p> <p>Impact on people or the environment: Positive impact on employees' physical and mental health, reducing office-related injuries and illnesses, reducing stress levels and increasing comfort at work.</p>	Own operations	Direct link to strategy And the business model	Impact	Positive, actual/ -	<p>[S] Improving comfort at work, reducing the risk of occupational illness and injury, increasing productivity and reducing sickness absence, and strengthening employee engagement and satisfaction.</p> <p>[D] Implement and maintain an Integrated Management System in accordance with EN ISO 45001, including policy, objectives, risk assessment and prevention and response procedures.</p>

Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Link to strategy and business model	Impact/ Risk/ Opportunity	Type of impact / Time horizon	[S] Current and anticipated impacts / [D] Actions taken
	Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	<p>Wage differentials when performing work of similar value.</p> <p>Impact on people or the environment: Negative impact on job satisfaction, employee motivation and loyalty and increased sense of injustice within the organisation.</p>	Own operations	Direct link to strategy And the business model	Impact	Negative, actual/ -	<p>[S] Decreased employee motivation and commitment, decreased job satisfaction, increased employee turnover.</p> <p>[D] Planned activities include monitoring the gender pay gap and organising diversity and anti-bias training.</p>
		Training and skills development	<p>Investing in the skills development of its employees by organising technical training, soft skills development programmes and certification courses.</p> <p>Impact on people or the environment: Positive impact on professional development, increased competence and employability of employees.</p>	Own operations	Direct link to strategy And the business model	Impact	Positive, actual/ -	<p>[S] Increase efficiency, innovation and employee engagement, thereby strengthening the Comarch Group's competitiveness on the market and reducing the risk of staff turnover.</p> <p>[D] Provide access to a corporate training platform offering e-learning courses in technical and soft skills, available remotely. Ability to self-select training, conferences and certification courses according to job profile, interests and career direction.</p>
		Measures against violence and harassment in the workplace	<p>Take action to address violence and harassment in the workplace. Among other things, Comarch has introduced a Code of Ethics that underpins the organisation's values, as well as implemented mechanisms to report violations in an anonymous and secure manner. Comarch has implemented an Anti-Discrimination and Anti-Bullying Policy - the date of approval by the Board is 30 April 2025.</p> <p>Impact on people or the environment: Positive impact on employees' psychological wellbeing, their sense of security, equal treatment and trust in their employer.</p>	Own operations	Direct link to strategy And the business model	Impact	Positive, Potential/ short, medium, long term	<p>[S] Building a safe and inclusive working environment, enhancing employees' trust in the organisation, reducing the risk of incidents of violence and harassment and supporting long-term staff engagement and retention.</p> <p>[D] In 2025, Comarch adopted an Anti-Bullying Policy, complementing the existing Code of Ethics. An anti-bullying presentation and online training has been made available to employees as part of the Integrated Management System. Mechanisms for anonymous reporting of concerns are also in place, going beyond the requirements of the Whistleblower Protection Act.</p>

			Description of impact / Impact on people or environment	Place of impact in the value chain	Link to strategy and business model	Impact/ Risk/ Opportunity	Type of impact / Time horizon	[S] Current and anticipated impacts / [D] Actions taken
Topic	Sub-topic	Sub-sub-topics						
		Diversity	<p>Disparities in the representation of women at different levels of employment.</p> <p><u>Impact on people or the environment:</u> Inequalities negatively affect the sense of fairness and belonging in the organisation, reduce the commitment of some employees and can contribute to increased turnover.</p>	Own operations	Direct link to strategy And the business model	Impact	Negative, potential/ short, medium, long term	<p>[S] Reduction of diversity of perspectives in decision-making processes, reduction of innovation and adaptability of the organisation, and negative perception of the Comarch Group as an employer.</p> <p>[D] As part of its sustainability strategy, Comarch has set a goal of increasing the proportion of women in management positions to a level equivalent to their overall share of the organisation's workforce</p>
Affected communities	Specific disclosure		<p>Community involvement including social and charitable activities.</p> <p><u>Impact on people or the environment:</u> The social and charitable activities carried out by the Comarch Group have a positive impact on local communities by supporting education, culture, health, sport and NGOs.</p>	Own operations, downstream	Indirect link to strategy And the business model	Impact	Positive, actual/ -	<p>[S] Building a positive image of the Comarch Group as a socially responsible organisation, strengthening relations with local communities, increasing brand recognition and fostering employee motivation and pride in belonging to the organisation.</p> <p>[D] Sponsorship of local initiatives, youth sports, cultural and educational events.</p>
Business conduct	Corporate culture		<p>Corporate governance plays a key role in shaping the Comarch Group's activities, influencing both its internal organisational processes and its external impact. The Comarch Group aims to shape its governance practices on the basis of an operating model that supports decision-making consistent with high ethical standards and sustainable development.</p> <p><u>Impact on people or the environment:</u> Transparent and ethical governance reduces the risks of fraud, discrimination or unethical practices, fostering a culture of compliance and accountability. Effective corporate governance fosters long-term decision-making with environmental and social considerations, which supports ESG objectives and reduces the organisation's negative impact on the environment.</p>	Own operations	Direct link to strategy And the business model	Impact	Positive, actual/ -	<p>[S] Strengthen transparency in decision-making processes, build stakeholder trust, reduce risks of irregularities and unethical practices, support the long-term sustainability of the organisation and improve its reputation in the domestic and international markets.</p> <p>[D] Adoption and application of the Group's Code of Ethics, implementation and maintenance of the Integrated Management System, functioning of the Supervisory Board and Audit Committee.</p>

			Description of impact / Impact on people or environment	Place of impact in the value chain	Link to strategy and business model	Impact/ Risk/ Opportunity	Type of impact / Time horizon	[S] Current and anticipated impacts / [D] Actions taken	
Topic	Sub-topic	Sub-sub-topics							
	Protection of whistleblowers		<p>The Comarch Group has an anonymous whistleblowing system and whistleblower protection mechanisms in place, available to all its own employees. This system was developed and launched in advance, even before the relevant regulations came into force.</p> <p><u>Impact on people or the environment:</u> An anonymous whistleblowing system enhances employee safety, promotes an ethical culture and reduces the risk of abuse, bullying or discrimination, strengthening trust and transparency within the organisation.</p>	Own operations	Direct link to strategy And the business model	Impact	Positive, actual/ -	<p>[S] Early detection of potential violations, reduction of legal and reputational risks, building an ethical culture within the organisation and increasing employee confidence in internal compliance management mechanisms.</p> <p>[D] Implement anonymous whistleblowing mechanisms, operating independently and in accordance with the safety and security of whistleblowers.</p>	
	Management of relationships with suppliers including payment practices		<p>The Comarch Group has a sustainability policy for suppliers, as well as a supplier analysis procedure.</p> <p><u>Impact on people or the environment:</u> Reducing social and environmental risks in the supply chain. It positively influences working conditions, respect for human rights and the reduction of negative environmental impacts of suppliers, supporting responsible and ethical business practices.</p>	Own operations, Upstream	Direct link to strategy And the business model	Impact	Positive, actual/ -	<p>[S] Reducing risks related to social and environmental non-compliance in the value chain, increasing control over the ethical and quality standards of business partners, and strengthening the social and environmental responsibility of the entire Comarch Group.</p> <p>[D] The Comarch Group implements a process to analyse suppliers for compliance with sustainability criteria, including environmental, social and ethical aspects. Suppliers are required to comply with the Code of Conduct for Suppliers.</p>	
	Corruption and bribery	Prevention and detection including training	Incidents	<p>Comarch counteracts corruption through clear and strict regulations included in its internal policies, such as codes of ethics or compliance procedures. Group companies are committed to transparency in all business relationships, ensuring compliance with international anti-corruption standards.</p> <p><u>Impact on people or the environment:</u> Anti-corruption strengthens the culture of integrity, accountability and trust in internal and external relations. It increases the transparency of the organisation's activities, reduces the risk of fraud and promotes equal treatment of business partners, which translates into operational stability and a positive market image.</p>	Own operations	Indirect link to strategy And the business model	Impact	Positive, actual/ -	<p>[S] Increase stakeholder confidence and minimise legal and reputational risks, supporting the long-term stability and credibility of the Comarch Group.</p> <p>[D] Implementation of a Code of Ethics, training for employees on business ethics and anti-corruption, mechanisms for anonymous reporting of violations.</p>
	Specific disclosure	Cyber security and data protection		<p>Ensure adequate cyber security and data protection.</p> <p><u>Impact on people or the environment:</u> Ensuring an adequate level of cyber security and data protection protects the rights and privacy of employees, customers and business partners minimises the risk of breaches, data leaks and cyber-attacks, increasing trust in the organisation and its services.</p>	Own operations, downstream	Direct link to strategy And the business model	Impact	Positive, Potential/ short, medium, long term	<p>[S] Strengthening the trust of customers and business partners and supporting the Comarch Group's reputation as a responsible and compliant organisation.</p> <p>[D] Implemented Information Security Management System compliant with ISO</p>

			Description of impact / Impact on people or environment	Place of impact in the value chain	Link to strategy and business model	Impact/ Risk/ Opportunity	Type of impact / Time horizon	[S] Current and anticipated impacts / [D] Actions taken
Topic	Sub-topic	Sub-sub-topics						
								27001, personal data protection policies, regular staff training on cyber security and personal data processing.
	Cyber security and data protection		Cyber security and data protection - data leakage	Own operations, downstream	Direct link to strategy And the business model	Risks	- / short, medium, long term	<p>[S] The consequences of a data leak include breaches of data subjects' privacy, risk of financial loss, loss of trust from customers and business partners, and possible legal and refutation sanctions for the organisation. Depending on the scale of the incident, a leak can also disrupt operational continuity and affect a company's competitive position.</p> <p>[D] Implemented Information Security Management System compliant with ISO 27001, personal data protection policies, regular staff training on cyber security and personal data processing.</p>

Individual resilience and risk and opportunity management

As a global provider of IT services and solutions, Comarch has operations that inherently have a low carbon footprint compared to carbon-intensive sectors such as heavy industry or energy. The company's main operations focus on digital services, software development and data management, which minimises direct dependence on processes that emit significant amounts of CO₂. This specificity of operations makes Comarch's business model more resilient to the direct effects of climate change.

This resilience was confirmed through a scenario analysis conducted, taking into account various IPCC and IEA climate scenarios, as well as TCFD recommendations, with an assessment of the impact of climate change on operations and data centre operations. The resilience analysis was conducted in 2024 and covered in-house operations, including Comarch Group locations and all key Data Centres.

The Comarch Group has a designated ESG Strategy, which includes sustainability and greenhouse gas reduction targets. In the near term, the Group plans to align its emission reduction targets in line with the Science Based Targets initiative (SBTi), which it joined in September 2024. These measures aim to reduce the environmental impact of its operations and increase the transparency of its climate change mitigation activities.

A key element of the Comarch Group's resilience strategy is to invest in modern, energy-efficient data centres. The Group implements technologies that optimise energy consumption, uses its own renewable energy sources and employs cooling systems with lower energy requirements, thus reducing the environmental impact of its operations. Comarch also purchases electricity with a certificate of origin from renewable sources.

Comarch is optimising energy procurement costs by diversifying its data centres and investing in data centres in locations with lower energy costs, including France and the US.

As a global organisation, Comarch has a process in place to analyse risks and opportunities, including climate change risks - both physical and regulatory. The Group proactively monitors changes in environmental regulations and adapts its operational processes to comply with applicable legal requirements. A proactive approach in this regard reduces financial and reputational risks, which strengthens the resilience of the business model.

In the context of climate change risks and ensuring business continuity (Business Continuity), Comarch applies comprehensive security solutions to its data centres.

The Comarch Group has procedures and solutions in place to ensure business continuity, including:

- Business Continuity Plan (BCP),
- Disaster Recovery Solutions,
- Dispersal of office and data centre locations,
- Periodic audits of the solutions used.

The Comarch Group ensures high operational resilience and business continuity through the use of infrastructure safeguards in data centres, such as system redundancy and data replication - tailored to the specifics of projects and customer requirements. Regular testing and risk monitoring enable ongoing improvement of failover systems.

The leased data centres meet standards for reliability and security, and before selecting them, the Comarch Group carries out a detailed assessment of their ability to maintain business continuity.

The Comarch Group is well prepared for potential power outages caused by extreme weather events. Implemented procedures, data replication and redundant systems significantly increase operational resilience. Regular testing and risk monitoring are key to further improving business continuity systems.

In terms of the long-term resilience of the business model, ownership stability is also crucial. Comarch S.A. underwent a process of ownership change, as a result of which it was acquired by CVC Capital Partners. The

new owner provides access to the expertise and existing know-how within the CVC Capital Partners group, as well as access to professional external advisors for, among other things, the preparation of a long-term strategy, including sustainable development, which enables more effective management of transitional and liability risks. With the support of the investment fund, the Comarch Group can invest more effectively in modern technologies and adapt to dynamic regulatory and market changes, which further strengthens its resilience to the challenges of climate transformation and sustainable development.

4. Management of impacts, risks and opportunities

4.1. Description of the processes to identify and assess material impacts, risks and opportunities

IRO-1

Significant impacts, risks and opportunities were identified on the basis of the **Double Materiality Assessment** carried out. The Double Materiality Assessment process, aligned with the requirements of the CSRD, was conducted for the first time in 2024 and consisted of the following

steps:

1. Identification of the sectors of activity and geographical coverage of the organisation, identification of the value chain,
2. Questionnaire survey conducted among representatives of Comarch S.A.'s Board of Directors and ESG Committee to identify key stakeholders,
3. Identification of potential impacts, risks and opportunities - creating a list of topics for further detailed assessment,
4. Assessment of materiality of impacts, risks and opportunities (impact and financial materiality),
5. Questionnaire survey conducted among relevant stakeholders,
6. Benchmarking and other contextual information,
7. Selection of indicators,
8. Prioritisation and final confirmation of results.

Impact materiality

The process of identifying and assessing material impacts was carried out taking into account the specific nature of the IT industry and the geographical areas in which Group companies operate. In the materiality impact assessment process, all sustainability issues listed in the thematic ESRs as listed in Article 16 of Appendix A of ESRs 1 were analysed in terms of the entity's own operations as well as business relationships. A survey of selected stakeholder groups influenced and affected by the entity was conducted.

The following were considered as key inputs for the analysis of the results:

- contextual information, i.e. identification of sectors of activity, geographical coverage of the organisation and identification of the value chain,
- stakeholder surveys,
- benchmarking results and scientific studies.

For each issue, aspects of sustainability were examined, taking into account four key parameters of impact materiality, i.e.: scale, scope, likelihood, and remediation of impact.

For each of the parameters studied, the Group assigned a score from 0 to 5.

Financial materiality

Financial materiality consisted of identifying potential risks and opportunities. The financial materiality assessment process started with the identification of actual and potential impacts on people and the environment. On this basis, the associated risks and opportunities were identified. Each risk and opportunity were then assessed in terms of its financial impact on the Comarch Group and its likelihood of occurrence. The assessment was carried out by internal finance (CFO) and ESG reporting experts, using parameters in line with the scale adopted in the Comarch Group's risk management process in place. Key inputs for the performance analysis included:

- contextual information, i.e. identification of sectors of activity, geographical coverage of the organisation and identification of the value chain,
- stakeholder surveys,
- information on identified impacts,
- benchmarking results and scientific studies.

Financial materiality was determined on the basis of an analysis of risks and opportunities, making an assessment along two dimensions: probability of occurrence and potential financial impact. For each of these parameters, the Comarch Group awarded a score on a scale from 1 to 5.

Double materiality principle

Any sustainability issue with a material impact, material risk or material opportunity was considered material from a double materiality perspective and therefore reportable using the relevant disclosure standards and requirements.

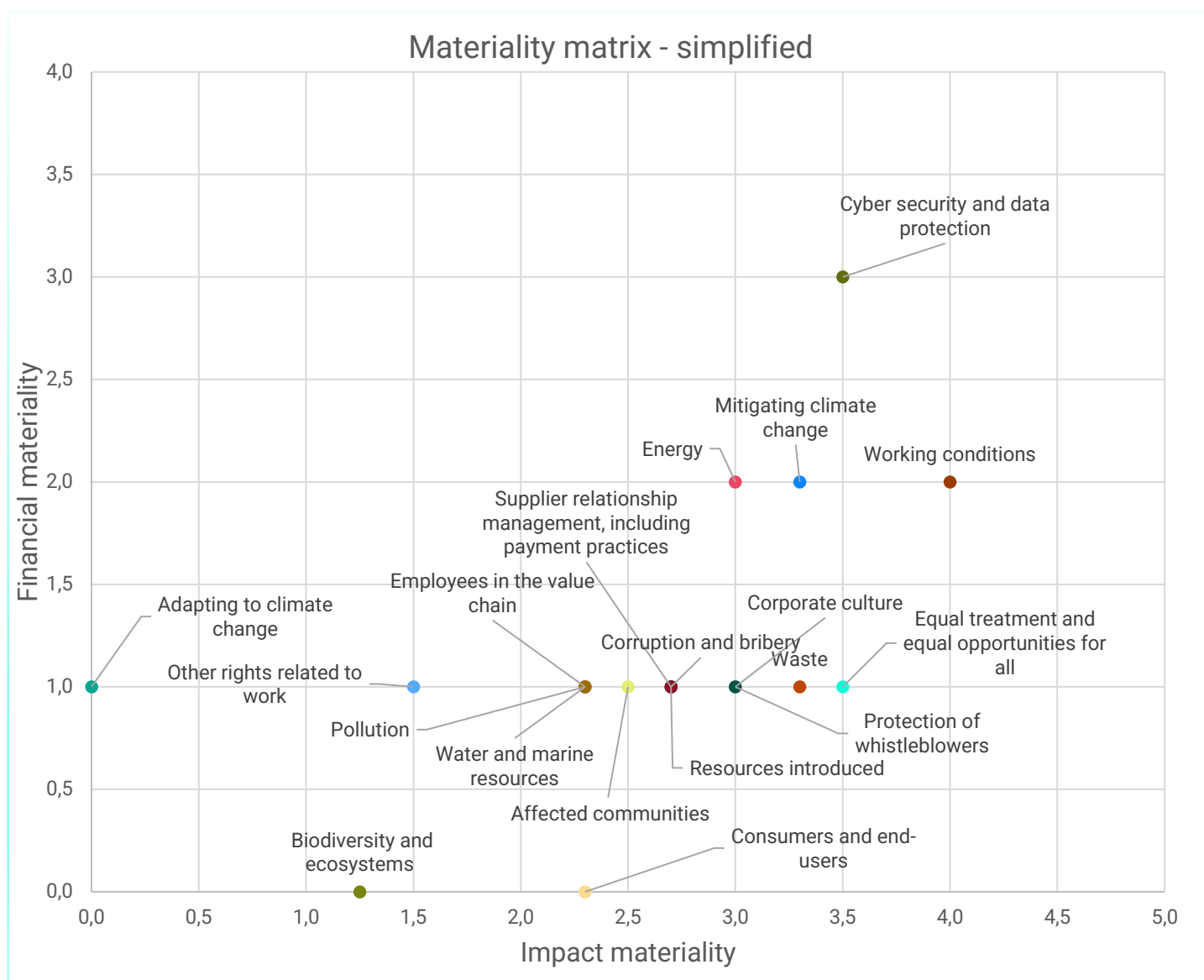
Stakeholder views and benchmarking

In order to comprehensively understand the impact of the Comarch Group's activities on key areas relevant from a non-financial reporting and sustainability perspective, a survey was conducted. The survey was designed to gather the opinions and assessments of internal and external stakeholders to enable the identification of key ESG issues relevant to the Group. As part of the survey, detailed analyses were carried out among members of the ESG Committee and representatives of the Human Resources Department, who, as specialists in their respective areas, provided valuable information on the impact of the Group's activities. The survey was complemented by less extensive questionnaires addressed to a wide range of stakeholders, including employee representatives in Poland and abroad, as well as key suppliers and customers.

As part of the double materiality analysis, a comparative analysis of IT companies was carried out with the aim of identifying and assessing the key sustainability aspects affecting the operation of the companies under study. The benchmarking exercise completed the key inputs for the identification of the Comarch Group's actual and potential impacts, risks and opportunities, underpinning the further materiality assessment process in accordance with the ESRS implementation guidelines - EFRAG IG 1.

Results of the Comarch Group's materiality assessment

As a result of the study, the Comarch Group developed a materiality matrix, which made it possible to define material topics.



Issues that received a score of at least 2.5 in the impact analysis, or whose risk or opportunity value exceeded 2, were considered important.

The materiality testing process identified:

- 7 key stakeholder groups,
- 20 material impacts,
- 6 material risks and 2 material opportunities

These are described in detail in the section on the SBM-3 disclosure requirement.

Material risks and opportunities identified during the double materiality assessment process are subject to subsequent assessment in accordance with the adopted risk management policy.

Integrating the results of materiality testing into the overall risk management process

The results of the materiality study set the strategic directions for the Comarch Group's further activities, enabling it to focus on the areas of greatest importance from the perspective of the organisation and its stakeholders. The decision-making process for determining material impacts, risks and opportunities, as well as their monitoring, has been fully integrated into the functioning risk management system and is subject to approval by the parent company's Board of Directors.

Description of processes for identifying and assessing significant climate-related impacts, risks and opportunities

E1.IRO-1

The Group has carried out a scenario analysis of the anticipated physical and transition risks associated with progressive climate change.

The aim of the analysis was to comprehensively identify both the risks posed by climate change - including physical risks and risks associated with the energy and regulatory transition - as well as the development opportunities presented by the global transition to a low-carbon economy model.

The analysis provided Comarch Group with information on the potential impact of different climate scenarios on the business model, operational resilience and market competitiveness, supporting strategic decision-making.

The scope of the analysis covered the Group's entire global operations, with a particular focus on key locations, including data centres (Data Centres) that play a strategic role in ensuring the operational continuity and security of IT infrastructure, as well as regions most vulnerable to the effects of climate change, such as coastal areas prone to flooding, drought regions and extreme heat zones.

The analysis covered various business segments, including:

- **Data centres:** Analysis of energy consumption, cooling requirements and natural disaster risks.
- **Cloud services:** assessing the impact of climate change on service delivery and data integrity.
- **Software development:** Understanding how sustainability trends can shape software design and functionality.

The analysis considers short-term, medium-term and long-term impacts.

As part of the process of identifying and assessing climate impacts, the Comarch Group analysed its operational activities and development plans to identify actual and potential sources of greenhouse gas emissions. The analysis covered both its own operations and links across the value chain, with a particular focus on energy consumption in data centres, office building operations, employee transport, business travel and external services. The assessment of impacts was carried out in relation to total GHG emissions and their potential impact on climate change. The results of this assessment, including the calculation methodology, data sources and GHG Protocol emissions classification, are detailed in the disclosures contained in ESRS section E1-6.

This analysis uses the Intergovernmental Panel on Climate Change (IPCC)'s greenhouse gas emission scenarios, such as RCPs (Representative Concentration Pathways), as a basis for predicting future climate change.

Greenhouse gas emission scenarios were used, such as:

RCP 2.6: An ambitious scenario to limit global warming below 2°C, requiring significant reductions in greenhouse gas emissions and a rapid transition to renewable energy sources.

RCP 4.5: Intermediate, moderate scenario in which emissions peak around 2040 and then gradually decline, leading to a temperature increase of around 2.5°C by 2100.

RCP 8.5: High emissions scenario, illustrating the lack of effective decarbonisation measures.

The inclusion of IEA (International Energy Agency) and electricity access scenarios in the analysis for Comarch provides the right context, especially as the technology and software group is heavily dependent on reliable and sustainable energy.

Scenarios used included:

Net Zero Emissions by 2050 (NZE): Achieve net zero emissions globally by 2050 through a rapid energy transition, reliance on renewable energy and improved energy efficiency.

Stated Policies Scenario (STEPS): Based on currently implemented or announced policies, resulting in moderate progress in energy access and emission reductions.

Sustainable Development Scenario (SDS): A more sustainable pathway, combining sustainable energy access and climate goals.

TCFD's scenario analysis recommendations were also applied to this analysis, enabling the identification and assessment of climate-related risks and opportunities across three key time horizons: short-term, medium-term and long-term. This approach allowed for a comprehensive understanding of the potential impacts of climate change on the organisation's operations and the identification of strategic actions needed to manage these challenges.

Short term (up to 2030): Focus on current climate policies, implementation of short-term actions and their impact on operations.

Medium term (2030-2050): Consideration of energy sector transformation and long-term investment decisions.

Long term (up to 2080): Assessing the impacts of achieving the Paris Agreement goals and their effects on global economic and environmental systems.

The integration of the IPCC and IEA scenarios provides a coherent picture of climate and transition risks. The emission levels determined by the IPCC have been combined with the IEA's energy transition projections to account for both global climate change and regional energy strategies.

For the low emissions pathway (IPCC RCP 2.6) compiled with the IEA NZE, a rapid transition to renewable energy sources and full electrification of operations is assumed. This scenario has high adaptation costs and transition risks, but minimises the physical impacts associated with climate change.

With moderate emissions (IPCC RCP 4.5) in combination with the IEA SDS, a partial shift away from fossil fuels to renewable energy sources is anticipated. Transition risks are moderate here, as are the physical impacts.

In contrast, in the high emissions scenario (IPCC RCP 8.5) combined with IEA STEPS, fossil fuels dominate and emissions reductions are minimal. Such a pathway results in significant physical and reputational risks that can seriously affect the sustainability of business operations.

Results of the analysis

The scenario analysis showed that the key threat, related to climate change, is the rising cost of energy, which will directly affect the operation of data centres, as well as possible power cuts.

Global warming is increasing the demand for energy to cool IT infrastructure, which, combined with rising electricity prices, will lead to higher operating costs. IT companies, including the Comarch Group, will need to implement increasingly advanced energy-saving technologies and optimise their solutions to minimise the negative economic impact of climate change.

Climate change can increase the risk of power outages through, among other things, extreme temperatures that increase the demand for energy, such as for air conditioning, which can lead to grid overloads and failures, and through extreme weather events such as hurricanes, storms, floods and fires that can damage energy infrastructure.

In addition, increasing ESG-related regulatory pressures and the potential introduction of carbon taxes in various jurisdictions will put additional financial strain on the business, forcing investment in renewables and decarbonisation of operational processes. The climate scenarios used are consistent with the assumptions in the financial statements and do not affect the going concern or asset valuations over the assumed time horizon. The scenarios extend the assessment of risks and opportunities, supporting long-term strategic planning.

The Comarch Group has not identified activities that are permanently inconsistent with the goals of a climate-neutral economy. Expansion of IT infrastructure, including data centres, may result in an increase in the cost of energy to power the data centres, including through the purchase of green energy. Expenditure of this type is taken into account in strategic planning, but at the date of the report has no material impact on the data presented in the financial statements.

The key financial impacts identified in the analysis are:

- **An increase in operating costs** - in particular an increase in the cost of energy required to cool data centres,
- **The financial burden of regulation** - including carbon taxes and new ESG requirements,
- **The need for investment** - in energy-saving technologies, renewable energy sources and infrastructure modernisation,
- **Potential financial losses** - as a result of climatic emergencies, operational disruptions and contractual losses,
- **Reputational and legal risks** - related to the failure to adapt to the changing demands of stakeholders and regulators,
- **Reducing operating costs in the long term** - by investing in energy-efficient technologies and expanding data centres in locations with lower energy costs,
- **Increase competitiveness** - by developing IT product and service offerings that support sustainability and attracting customers who expect green solutions.

The Comarch Group has defined the following issues as not material:

Pollutants - E2

E2.IRO-1

The Comarch Group conducted a review of its own locations and business activities to identify impacts, risks and opportunities related to air, water and soil pollution microplastics and potentially hazardous substances. Due to the nature of its business, based mainly on the

provision of IT services, software development and ICT infrastructure management, the Comarch Group's activities do not involve the emission of significant quantities of harmful substances into the environment. The Group does not carry out industrial or manufacturing processes that would generate significant pollution. Consumption of consumables, noise emissions, consumption of chemical substances and generation of hazardous waste remain marginal.

No significant dependencies on ecosystem services were also identified. The review was based on data from the environmental management system (ISO 14001) and an analysis of impacts in the value chain. Due to the lack of impacts on local communities, the Comarch Group did not carry out dedicated consultation in this regard.

Water and marine resources - E3

E3.IRO-1

The Comarch Group conducted a review of its own resources, operations and services provided. In line with its business profile, the Group does not carry out activities related to the exploitation, use or protection of inland or marine waters and its operations do not have a significant impact on these water resources. The nature of the Group's operations makes its impact on water resources insignificant in terms of environmental impact. The Comarch Group's water consumption is mainly due to the daily needs of employees in the offices and a marginal amount for data centre cooling. In the case of one subsidiary, water consumption is additionally linked to the operation of the leisure infrastructure - water is used to fill the swimming pool, create the ice rink and irrigate the sports field. The water used for the Group's needs is sourced exclusively from external suppliers and is sourced from water mains, which minimises the Group's impact on natural water resources. Water consumption is monitored and its scale is limited and has no significant environmental or financial significance in the context of the Comarch Group's operational activities. As there is no impact on local communities, the Comarch Group has not carried out dedicated consultation in this regard.

Biodiversity - E4

E4.IRO-1

The Comarch Group conducted a review of its own locations and value chain to identify actual and potential impacts, dependencies, risks and opportunities related to biodiversity and ecosystems. The analysis took into account the location criteria, the nature of the business and the level of control over operations in the value chain. The Group has no business activities that significantly affect biodiversity. Indirect impacts, such as those related to the use of raw materials in hardware, are limited and relate to areas outside the Group's direct control, within the third and fourth tier value chain.

Within its own operations, the Group has no significant operational dependencies on ecosystems or their services. The Group has not identified systemic, transitional or physical risks related to biodiversity.

Given the lack of operational locations close to environmentally sensitive areas and the lack of significant impacts on ecosystem services, the Group did not consult with affected communities.

Description of processes for identifying and assessing significant impacts, risks and opportunities related to resource use and the circular economy

E5.IRO-1

The Comarch Group carried out a process to identify and assess material impacts, risks and opportunities related to resource use and closed-loop economy issues as part of a double materiality analysis. As part of the review of the Group's operations, resources fed into the

business were identified and the amount, types and methods of handling waste generated, including waste electronic equipment, were identified.

A value chain analysis was also carried out, identifying minerals - including conflict minerals and rare earth elements - used in equipment essential to the Group's operations, such as computers and servers. The assessment of potential risks and opportunities included factors such as the availability of critical raw materials, the possibility of implementing the principles of a circular economy and the potential increase in the cost of primary resources due to environmental regulations.

During the process of identifying significant impacts, risks and opportunities related to resource use and the circular economy, the Comarch Group did not conduct dedicated consultations with external stakeholders, including affected communities.

Description of processes for identifying and assessing significant impacts, risks and opportunities - Corporate governance

G1.IRO-1

The Comarch Group carried out a process to identify and assess material impacts, risks and opportunities related to corporate governance as part of a double materiality assessment.

As part of the process of identifying and assessing material impacts, risks and opportunities in the area of corporate governance, Comarch S.A. - as a 2024 listed entity - took into account the increased expectations of stakeholders, especially shareholders, analysts and capital market institutions, regarding the quality of management processes and transparency of disclosures.

4.2. Disclosure requirements in ESRS covered by the undertaking's sustainability statement

IRO-2

The ESRS requirements for each disclosure in the Group Report, with references to the relevant clauses, chapters and page numbers, are summarised in the table below.

Disclosure number	Name of disclosure	Chapter in the Report
ESRS 2 General disclosures		
BP-1	General basis for sustainability reporting	1.1
BP-2	BP-2 Disclosure in relation to special circumstances	1.2
GOV-1	The role of the administrative, management and supervisory bodies	2.1
GOV-2	Information provided to the entity's administrative, management and supervisory bodies and the sustainability issues they undertake	2.2
GOV-3	Mainstreaming sustainability-related outcomes into incentive schemes	2.3
GOV-4	Due diligence statement	2.4
GOV-5	Risk management and internal controls over sustainability reporting	2.5
SBM-1	Strategy, business model and value chain	3.1
SBM-2	Stakeholder interests and opinions	3.2
SBM-3	Significant impacts, risks and opportunities and their interrelationship with the strategy and the business model	3.3
IRO-1	Description of processes to identify and assess significant impacts, risks and opportunities	4.1
IRO-2	ESRS disclosure requirements covered by the entity's sustainability statement	4.2
ESRS E1 Climate change		
ESRS E1-1	Transition plan for climate change mitigation	6.1
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	6.2
ESRS E1-2	Policies related to climate change mitigation and adaptation	6.3
ESRS E1-3	Actions and resources in relation to climate change policies	6.4
ESRS E1-4	Targets related to climate change mitigation and adaptation	6.5
ESRS E1-5	Energy consumption and mix	6.6
ESRS E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	6.7
ESRS E1-7	GHG removals and GHG mitigation projects financed through carbon credits	6.8
ESRS E1-8	Internal carbon pricing	6.9
ESRS E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	6.10
ESRS E5 Resource use and the circular economy		
ESRS E5-1	Policies related to resource use and circular economy	7.1
ESRS E5-2	Actions and resources related to resource use and circular economy	7.2
ESRS E5-3	Targets related to resource use and circular economy	7.3
ESRS E5-4	Resource inflows	7.4

Disclosure number	Name of disclosure	Chapter in the Report
ESRS E5-5	Resource outflows	7.5
ESRS E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	7.6
ESRS S1 Own staff resources		
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	8.1
ESRS S1-1	Policies related to own workforce	8.2
ESRS S1-2	Processes for engaging with own workers and workers' representatives about impacts	8.3
ESRS S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	8.4
ESRS S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	8.5
ESRS S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	8.6
ESRS S1-6	Characteristics of the undertaking's employees	8.7
ESRS S1-7	Characteristics of non-employee workers in the undertaking's own workforce	8.8
ESRS S1-8	Collective bargaining coverage and social dialogue	8.9
ESRS S1-9	Diversity metrics	8.10
ESRS S1-10	Adequate wages	8.11
ESRS S1-11	Social protection	8.12
ESRS S1-13	Training and skills development metrics	8.13
ESRS S1-14	Health and safety metrics	8.14
ESRS S1-15	Work-life balance metrics	8.15
ESRS S1-16	Compensation metrics (pay gap and total compensation)	8.16
ESRS S1-17	Incidents, complaints and severe human rights impacts	8.17
ESRS S3 Affected Communities		
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	9.1
S3-1	Policies related to affected communities	9.2
S3-2	Processes for engaging with affected communities about impacts	9.3
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	9.4
S3-4	Taking action on material impacts, and approaches to mitigating material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions and approaches	9.5
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	9.6
ESRS G1 Business conduct		
ESRS G1-1	Business conduct policies and corporate culture	10.1

Disclosure number	Name of disclosure	Chapter in the Report
ESRS G1-2	Management of relationships with suppliers	10.2
ESRS G1-3	Prevention and detection of corruption and bribery	10.3
ESRS G1-4	Confirmed incidents of corruption or bribery	10.4
ESRS G1-6	Payment practices	10.5
Personal data and cyber security (specific disclosure)		
G2-SBM3	Material impacts, risks and opportunities related to the area of personal data and cyber security.	11.1
G2-1	Policies related to the personal data area and cyber security.	11.2
G2-2	Addressing material impacts and applying approaches to manage significant risks and exploit material opportunities related to the area of personal data and cyber security.	11.3
G2-3	Measures and targets for managing material negative impacts, enhancing positive impacts and managing material risks and opportunities.	11.4

List of data points included in cross-cutting standards and thematic standards that stem from other EU legislation [ESRS 2 Appendix B].

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Reference to regulations on indicators reference	EU Climate Law reference	Place in report (chapter)
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/181627 , Annex II		2.1
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		2.1
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				2.4
ESRS 2 SBM-1 Participation in fossil fuel activities paragraph 40(d)(a)	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on social risk	Annex II of Delegated Regulation (EU) 2020/1816		Irrelevant
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Annex II of Delegated Regulation (EU) 2020/1816		Irrelevant
ESRS 2 SBM-1 Participation in controversial weapons activities paragraph 40(d)(iii)	Indicator No 14 in Table 1 of Annex I		Article 12(1) of Delegated Regulation (EU) 2020/1818 (7), Annex II of		Irrelevant

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Reference to regulations on indicators reference	EU Climate Law reference	Place in report (chapter)
			Delegated Regulation (EU) 2020/1816		
ESRS 2 SBM-1 Participation in tobacco cultivation and production activities paragraph 40(d)(iv).			Article 12(1) of Delegated Regulation (EU) 2020/1818, Annex II of Delegated Regulation (EU) 2020/1816		Irrelevant
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	6.1
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		Irrelevant
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		6.5
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				6.6
ESRS E1-5 Energy consumption and energy mix point 37	Indicator No 5 in Table 1 in Annex I				6.6
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	I Indicator number 6 Table #1 of Annex 1				6.6
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector,	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		6.7

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Reference to regulations on indicators reference	EU Climate Law reference	Place in report (chapter)
		emissions and residual maturity			
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		6.7
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	6.8
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		6.10
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			6.10
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			6.10
ESRS E1-9 Degree of exposure of the portfolio to climate - related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		6.10
ESRS E2-4 Amount of each pollutant listed in Annex II of the EPRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				Irrelevant

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Reference to regulations on indicators reference	EU Climate Law reference	Place in report (chapter)
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Irrelevant
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				Irrelevant
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Irrelevant
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Irrelevant
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	I Indicator number 6.1 Table #2 of Annex 1				Irrelevant
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				Irrelevant
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				Irrelevant
ESRS 2 SBM 3-E4 point 16(c)	Indicator number 14 Table #2 of Annex 1				Irrelevant
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				Irrelevant
ESRS E4-2 Sustainable Ocean/sea practices or policies paragraph 24(c).	Indicator number 12 Table #2 of Annex 1				Irrelevant
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				Irrelevant
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				7.5
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				7.5
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				8.1
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				8.1
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				8.2
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		8.2
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				8.2
ESRS S1-1 workplace accident prevention policy or	Indicator number 1 Table #3 of Annex I				8.2

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Reference to regulations on indicators reference	EU Climate Law reference	Place in report (chapter)
management system paragraph 23					
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				8.4
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		8.14
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				8.14
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		8.16
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				8.16
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				8.17
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		8.17
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I				Irrelevant
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Irrelevant
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Irrelevant
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Irrelevant
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Irrelevant
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator No 14 in Table 3 of Annex I				Irrelevant
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				9.2

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Reference to regulations on indicators reference	EU Climate Law reference	Place in report (chapter)
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		9.2
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				9.5
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Irrelevant
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Irrelevant
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				Irrelevant
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				10.1
ESRS G1-1 Protection of whistleblowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				10.1
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		10.3
ESRS G1-4 Standards of anticorruption and anti-bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				10.3

Environment

5. EU taxonomy

Taxonomy is the informal name for the European Union legislation that defines the criteria for recognising an activity as environmentally sustainable. The Taxonomy was adopted by Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investment, which requires disclosure of whether and to what extent a company's activities comply with the EU Taxonomy.

The EU Taxonomy disclosures for the Comarch Group for 2024 have been prepared on the basis of the EU Taxonomy Regulation issued by the European Commission and a number of implementing acts, including:

- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investment, amending Regulation (EU) 2019/2088.
- EU Commission Delegated Regulation 2021/2139 of 4 June 2021 establishing technical qualification criteria for determining the conditions under which an economic activity qualifies as making a significant contribution to climate change mitigation or adaptation, and whether that economic activity does not cause significant harm to any other environmental objective (*'Delegated Act establishing Technical Qualification Criteria'*).
- EU Commission Delegated Regulation 2021/2178 of 6 July 2021, supplementing Regulation 2020/852 by clarifying the content of the presentation of the information on environmentally sustainable business activities to be disclosed by companies subject to Article 19a or 29a of Directive 2013/34/EU and specifying the method to comply with this disclosure obligation (*"Delegated Act to Article 8 of the EU Taxonomy"*).
- Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards business activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards public disclosure of specific information in relation to those business activities (hereinafter: the 'Nuclear and Gas Regulation').
- Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 laying down additional technical eligibility criteria for determining the conditions under which certain economic activities qualify as making a significant contribution to climate change mitigation or adaptation, and whether those activities do not cause significant damage to any other environmental objective.
- 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 technical qualification criteria to determine the conditions under which an economic activity qualifies as making a significant contribution to the sustainable use and conservation of water and marine resources, to the transition towards a closed loop economy in the prevention and control of pollution, or in the protection and restoration of biodiversity and ecosystems, and to determine whether that economic activity does not cause serious harm to any other environmental objective, and amending Commission Delegated Regulation (EU) 2021/2178 as regards public disclosure of specific information in relation to those economic activities.

Identification of activities carried out by Comarch Group companies through the lens of the Taxonomy

The process of identifying activities that qualify for the EU Taxonomy systematics consisted in reviewing all activities carried out by Comarch S.A. and Comarch Group subsidiaries in relation to the environmental objectives indicated in the Taxonomy. The identification of activities was carried out in three areas: sales revenues generated, capital expenditures incurred and operating expenses incurred. The following were involved in the process of identifying activities qualifying for the EU Taxonomy systematics and assessing their compliance with the Technical Qualification Criteria: management, business area experts, controlling, persons responsible for the ESG area.

At the consolidated level, the Comarch Group has identified the following activities as significant activities that qualify for the EU Taxonomy and also generate revenue:

- "8.1 Data processing website management (hosting) and similar activities", which consists of revenues generated 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).
- "4.1 Providing data-driven IT/OT solutions" for GOZ, which consists of revenues generated from the sale of Comarch OSS products.

No activities have been identified in the Comarch Group that qualify for environmental objectives related to climate change adaptation, sustainable use and protection of water and marine resources, pollution prevention and control, and protection and restoration of biodiversity and ecosystems.

At the consolidated level, the Comarch Group has identified the following activities as significant activities that qualify for the EU Taxonomy and do not generate revenue:

- "6.5 Transport by motorbikes, passenger cars and light commercial vehicles". - Acquisition of cars for the Comarch fleet,
- "7.2 Renovation of existing buildings". - Expenditure related to the replacement of a lift in one of the office buildings in Krakow and the construction of a salt cave at the swimming pool,
- "7.6 Installation, maintenance and repair of renewable energy technology systems". - Expenditure related to the installation of photovoltaic panels on one of the office buildings.

Verification of compliance with the Technical Eligibility Criteria

The Comarch Group carried out a verification of compliance with the Technical Qualification Criteria for the activity eligible for the systematic, i.e. '8.1. Data processing website management (hosting) and similar activities', at consolidated level. The verification carried out showed a lack of compliance of the above-mentioned activity with some of the Technical Qualification Criteria, i.e.: the lack of verification by an independent third party of the implementation of the recommended practices listed in the European Code of Conduct on Energy Efficiency of Data Centres, as well as the lack of fulfilment of the Global Warming Potential criterion for refrigerants used in data centre air conditioning systems. The vast majority of refrigerants used have coefficients exceeding the limits indicated in the EU Taxonomy. Comarch will be taking steps to meet the Technical Qualification Criteria over the coming years.

The Comarch Group did not carry out a verification of compliance with the Technical Qualification Criteria for the activity qualifying for systematics, i.e. 4.1. "Provision of data-driven IT/OT solutions". This verification will be carried out in the next reporting year.

The Comarch Group has not verified compliance with the Technical Qualification Criteria for the following activities:

- "6.5 Transport by motorbikes, passenger cars and light commercial vehicles",
- "7.2 Renovation of existing buildings",
- "7.6 Installation, maintenance and repair of renewable energy technology systems",

due to their small share of the Comarch Group's business structure in 2024 compared to other operational areas.

Verification of compliance with the Minimum Guarantees

Verification of compliance with the Minimum Safeguards, which are set out in Article 18 of Regulation 2020/852 of 18 June 2020, was carried out in the Comarch Group in accordance with the recommendations made in the Final Report on Minimum Safeguards by the Platform on Sustainable Finance and additionally, bearing in mind the 2023 update of the OECD Guidelines for Multinational Enterprises, the Comarch Group also took into account the area of Science, Technology and Innovation when assessing compliance with the Minimum Safeguards. The Comarch Group meets the requirements of the Minimum Guarantees, i.e. it has and applies due diligence solutions to ensure that it conducts its business in accordance with the principles and recommendations in documents such as the OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions indicated in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and the principles and rights set out in the International Bill of Human Rights.

Amongst others, the Comarch Group has implemented:

- Code of Ethics applicable to Comarch Group companies available at: <https://www.comarch.pl/o-firmie/zrownowazony-biznes/kodeks-etyczny/>, in which Comarch, among other things, commits to:
 - compliance with international human rights and international labour standards,
 - compliance with the principles of fair competition, prevention of bribery, illegal payments and corruption.
- Sustainability Policy for Suppliers, which sets out the key principles that guide the Group in implementing its cooperation with business partners. In addition, the document represents a commitment to a sustainable procurement policy and sets out expectations for key suppliers, including, among other things, respect for human rights.
- The 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 the hallmarks of corruption.
- Contractor Analysis Policy (adopted 30 April 2025), which sets out the principles, responsibilities and standards in the process of analysing and assessing Contractors, with the aim of:
 - ensuring cooperation with reliable business partners,
 - minimising operational, legal and financial risks,
- A procedure for analysing and assessing suppliers and subcontractors to identify and manage risks in the supply chain.
- A whistleblowing system that allows for anonymous reporting with the possibility of anonymous two-way communication with the whistleblower and procedures governing whistleblowing.
- Compliance Policy (adopted on 30 April 2025), which is a set of principles, standards and commitments aimed at ensuring that the activities of Comarch Group Companies comply with applicable laws, ethical standards, quality standards and principles of sustainable development.
- Comarch Group HR Policy, which systematises the key aspects related to human resources management in the Group.

There have been no final convictions against Comarch S.A. or Comarch Group companies in the areas of human rights, corruption, fair competition behaviour and taxation.

A verification of the reporting database of the OECD NCP and the Business and Human Rights Resource Centre (BHRRC) was carried out, which showed that no reports occurred in relation to Comarch Group companies during the period covered by the verification.

Nuclear energy and natural gas activities

Neither Comarch S.A. nor the other Comarch Group companies are engaged in activities related to nuclear energy and natural gas within the meaning of the Delegated Act to Article 8 of the EU Taxonomy, and therefore this report does not present the compliance of the aforementioned activities with the systematisation defined in the Delegated Act establishing the Technical Qualification Criteria.

Nuclear and natural gas activities		YES/NO Comarch Group
Nuclear energy activities		
1.	The company conducts, finances or has exposure to the research, development, demonstration and deployment of innovative power generation facilities that produce energy through nuclear processes with minimal fuel cycle waste.	NO
2.	The company constructs, finances or has exposure to the construction and safe operation of new nuclear facilities for the generation of electricity or process heat, including for district heating or industrial processes such as hydrogen production, as well as their safety upgrades using the best available technology.	NO
3.	The company safely operates, finances or has exposure to existing nuclear facilities generating electricity or process heat, including for district heating or industrial processes such as hydrogen production from nuclear power.	NO
Natural gas activities		
4.	The company constructs or operates facilities for the generation of electricity using gaseous fossil fuels, finances this activity or has exposure to it.	NO
5.	The company builds, modernises and operates combined heat/cooling electricity generation facilities using gaseous fossil fuels, finances this activity or has exposure to it.	NO
6.	The company constructs, modernises and operates heat/cooling generation facilities using gaseous fossil fuels, finances or has exposure to these activities.	NO

Accounting principles

Key performance indicators were calculated in accordance with the Delegated Act to Article 8 of the EU Taxonomy on Disclosures, taking into account the company's own processes, existing reporting systems and assumptions made. A materiality criterion was applied in the process of establishing the indicators, so that values that are not material in 2024 from an operational expenditure perspective have not been included in the indicators. Specifically, in the case of OPEX, the numerator for activities 4.1, 6.5, 7.2, 7.6 was not calculated due to the absence of material operating expenditure in these activity categories.

The following rules were applied to calculate the percentage of turnover, CapEx and Opex qualifying for and compliant with the EU Taxonomy systematics:

Turnover

In order to establish a performance indicator in the form of a percentage of Comarch Group turnover qualifying for and complying with the EU Taxonomy systematics, the following principles were adopted:

- The percentage of turnover qualifying for the EU Taxonomy systematics and in line with the EU Taxonomy was calculated by dividing:
 - the sum of revenues identified as qualifying for the EU Taxonomy systematics and compliant with the EU Taxonomy - (all revenues relate to customer contracts) by the Comarch Group consolidated revenues disclosed in the consolidated income statement in the Comarch Group consolidated financial statements for the period 01.01.2024- 31.12.2024.

At the consolidated level, the Comarch Group has identified the following activities as significant activities that qualify for the EU Taxonomy:

- "8.1 Data processing website management (hosting) and similar activities", which consists of revenue generated 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).
- 4.1 'Provision of data-driven IT/OT solutions' for GOZ, which consists of revenue generated from the sale of Comarch OSS products.

The percentage of revenue related to qualifying activities in 2024 is 22% for the Comarch Group. These activities were considered not to be in line with the EU Taxonomy system due to the lack of fulfilment of the Technical Eligibility Criteria for these activities.

31 December 2024	
Percentage of Comarch Group turnover qualifying for the EU Taxonomy	Comarch Group (PLN '000)
Income from qualifying activities	430 277
Consolidated revenue	1 916 871
Ratio of revenues related to qualifying activities	22%
31 December 2024	
Percentage of Comarch Group turnover that complies with the EU Taxonomy	Comarch Group (PLN '000)
Revenue from compatible activities	0

Consolidated revenue	1 916 871
Ratio of revenue related to compliant activities	0%

Capital expenditure (CapEx)

In order to establish a performance indicator in the form of the percentage of capital expenditure (CapEx) of the Comarch Group qualifying for and complying with the EU Taxonomy systematics, the following principles were adopted:

- The percentage of capital expenditure (CapEx) qualifying for the EU Taxonomy systematics and in line with the EU Taxonomy was calculated by dividing:
 - the sum of capital expenditure identified as qualifying for the EU Taxonomy systematics and compliant with the EU Taxonomy by,
 - the sum of capital expenditures included in the Comarch Group's consolidated financial statements for the period 01.01.2024- 31.12.2024, *calculated according to the definition of the Taxonomy, according to which the sum of investments includes increases:*
 - *intangible assets (acquisition of intangible assets in Note 3.7. Other intangible assets),*
 - *property, plant and equipment (additions to property, plant and equipment in Note 3.3 Property, plant and equipment),*
 - *right-of-use assets (increases in Note 3.4 Right-of-use assets),*
 - *investment properties (increases in Note 3.5 Investment properties).*

Investments related to the activity "8.1. Data processing website management (hosting) and similar activities", concerning the expansion of the technical infrastructure of data centres, have been recognised as significant capital expenditures that qualify for the EU Taxonomy.

The percentage of capital expenditure related to eligible activities in 2024 is 11.8% for the Comarch Group. These investments were deemed not to be in line with the EU Taxonomy systematics due to the failure to meet the Technical Eligibility Criteria for the activity "8.1. Data processing website management (hosting) and similar activities".

In addition, in 2024 Comarch S.A., in addition to capital expenditures and operating expenses related to activities that generate revenue, identified and presented individual capital expenditures for activities that qualify for the EU Taxonomy, which do not generate revenue but enable the Company and the Comarch Group to reduce greenhouse gas emissions. These expenditures were identified for the following activities:

- Acquisition of cars for the Comarch fleet, classified under activity 6.5 *Transport by motorbikes, passenger cars and light commercial vehicles*. The percentage of capital expenditure related to this qualifying activity in 2024 is 3.3% for the Comarch Group. These investments were considered not to be in line with the EU Taxonomy systematics due to the lack of verification of the Technical Eligibility Criteria.
- Expenditures related to the replacement of a lift in one of the office buildings in Kraków and the construction of a salt cave at the swimming pool were qualified under activity 7.2. *Renovation of existing buildings*. The percentage of capital expenditure related to this qualifying activity in 2024 is 0.3% for the Comarch Group. These investments were considered not to be in line with the EU Taxonomy systematics due to the lack of verification of the Technical Eligibility Criteria.

- Expenditure related to the installation of photovoltaic panels on one of the office buildings owned by the Comarch Group is classified under activity 7.6. *Installation, maintenance and repair of renewable energy technology systems*. The percentage of capital expenditure related to this qualifying activity in 2024 is 0.1% for the Comarch Group. These investments were considered not to be in line with the EU Taxonomy systematics due to the lack of verification of the Technical Eligibility Criteria.

The total percentage of capital expenditure related to the above-mentioned eligible activities in 2024 is 11.5% for the Comarch Group.

Percentage of capital expenditure (CAPEX) of the Comarch Group qualifying for the EU Taxonomy	31 December 2024 Comarch Group (PLN '000)
Capital expenditure related to eligible activities	15 091
Total capital expenditure	131 645
Ratio of revenues related to qualifying activities	11,5%

Percentage of capital expenditure (Capex) of the Comarch Group in line with the EU Taxonomy	31 December 2024 Comarch Group (PLN '000)
Capital expenditure related to activities in line with	0
Total investment expenditure	131 645
Index of capital expenditures related to compatible activities	0%

Operating expenditure (OpEX)

In order to establish a performance indicator in the form of Operational Expenditure (OpEx) eligible for and compatible with the EU Taxonomy systematics, the following principles were adopted:

- The percentage of Operational Expenditure (OpEx) eligible for the EU Taxonomy systematics and compliant with the EU Taxonomy was calculated by dividing,
 - the sum of operational expenditure identified as eligible for and compliant with the EU Taxonomy by,
 - the sum of all direct, non-capitalised costs associated with:
 - research and development,
 - renovation and restoration of buildings,
 - leasing/short-term rental,
 - maintenance, preservation and repair,

other direct expenses related to the day-to-day operation of the property, plant and equipment, necessary for the continuous and efficient operation of the assets.

Expenditure related to the activity "8.1. Data processing website management (hosting) and similar activities", concerning the maintenance of data centre infrastructure in a good state of repair, has been recognised as significant operating expenditure eligible for the EU Taxonomy. The percentage of operating expenses related to eligible activities in 2024 is 13% for the Comarch Group. The largest share of operating expenditure related to maintenance of property, plant and equipment relates to Comarch's office infrastructure, not directly related to Comarch's activities, which qualifies under the EU Taxonomy. These expenses were considered not to be in

line with the EU Taxonomy systematics due to the failure to meet the Technical Eligibility Criteria for the activity "8.1. Data processing website management (hosting) and similar activities".

Percentage of operating expenditure (OPEX) of the Comarch Group qualifying for the EU Taxonomy	31 December 2024
	Comarch Group (PLN '000)
Operating expenses related to qualifying activities	8 344
Total operating expenditure	63 243
Ratio of revenues related to qualifying activities	13%

Percentage of capital expenditure (Capex) of the Comarch Group in line with the EU Taxonomy	31 December 2024
	Comarch Group (PLN '000)
Operating expenditure related to compliant activities	0
Total operating expenditure	63 243
Index of operating expenditure related to compliant activities	0%

Other information

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

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

Financial year 2024				Criteria for significant contribution						Criteria for the "do no serious harm" principle									
Economic activity (1)	Code or codes (2)	Turnover (3) PLN [000]	Part of turnover, 2024 (4) [%]	Climate change mitigation (5) [%]	Adaptation to climate change (6) [%]	Water and marine resources (7) [%]	Pollution (8) [%]	Closed loop economy (9) [%]	Biodiversity (10) [%]	Climate change mitigation (11) [Y/N]	Adaptation to climate change (12) [Y/N]	Water and marine resources (13) [Y/N]	Pollution (14) [Y/N]	Closed-loop economy (15) [Y/N]	Biodiversity (16) [Y/N]	Minimum guarantees (17) [Y/N]	Participation in activities in line with the systematic (A.1.) or qualifying for systematics	Category - Support activities (19) [E]	Category - Transition activities (20) [E]
A. ACTIVITIES ELIGIBLE FOR SYSTEMATICS																			
A.1. Types of environmentally sustainable activities (consistent with the systematics)																			
Turnover from environmentally sustainable activities (in accordance with the system) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	T	-		
Including supporting	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	T	-	E	
Including in favour of the transition	-	-	-	-						-	-	-	-	-	-	T	-		T
A.2 Activities classifiable to the systematics, but not environmentally sustainable (activities not in accordance with the systematics)																			
8.1 Data processing, website management (hosting) and similar activities	CCM 8.1	287 406	15%	N	N/EL	N/EL	N/EL	N/EL	N/EL								15%		
4.1 Provision of data-driven IT/OT solutions	CE 4.1	142 871	7%	N/EL	N/EL	N/EL	N/EL	N	N/EL								-		
Turnover from activities eligible for the systematics but not environmentally sustainable (non-systematic activities) (A.2)		430 277	22%	15%	-	-	-	7%	-								15%		
Total (A.1 + A.2)		430 277	22%	15%	-	-	-	7%	-								15%		
B. NON-SYSTEMATIC ACTIVITIES																			
Turnover from non-systematically eligible activities (B)		1 486 594	78%																
Total (A + B)		1 916 871	100%																

Comarch Group - Percentage of capital expenditure on products or services related to business activities in line with the systematic

Financial year 2024				Criteria for significant contribution						Criteria for the "do no serious harm" principle									
Economic activity (1)	Code or codes (2)	Investment outlays (3) PLN [000]	Percentage of capital expenditure, 2023(A)	Climate change mitigation (5) [%]	Adaptation to climate change (6)	Water and marine resources (7)	Pollution (8) [%]	Closed loop economy (9) [%]	Biodiversity (10) [%]	Climate change mitigation (11)	Adaptation to climate change (12)	Water and marine resources (13)	Pollution (14) [Y/N]	Closed-loop economy (15) [Y/N]	Biodiversity (16) [Y/N]	Minimum guarantees (17)	Participation in activities in line with the systematic (A.1.) or qualifying for systematics	Category - Support activities (19)	Category - Transition activities (20)
A. ACTIVITIES ELIGIBLE FOR SYSTEMATICS																			
A.1. Types of environmentally sustainable activities (consistent with the systematics)																			
Turnover from environmentally sustainable activities (in accordance with the system) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	T	-		
Including supporting	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	T	-	E	
Including for the benefit of the transition	-	-	-	-						-	-	-	-	-	-	T	-		T
A.2 Activities classifiable to the systematics, but not environmentally sustainable (activities not in accordance with the systematics)																			
8.1 Data processing, website management (hosting) and similar activities	CCM 8.1	10 261	7,8%	N	N/EL	N/EL	N/EL	N/EL	N/EL								31,4%		
6.5 Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	4 281	3,3%	N	N/EL	N/EL	N/EL	N/EL	N/EL								4,4%		
7.2 Renovation of existing buildings	CCM 7.2	413	0,3%	N	N/EL	N/EL	N/EL	N/EL	N/EL								-		
7.3 Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	-	-	N	N/EL	N/EL	N/EL	N/EL	N/EL								0,2%		
7.6 Installation, maintenance and repair of renewable energy technology systems	CCM 7.6	136	0,1%	N	N/EL	N/EL	N/EL	N/EL	N/EL								-		
Investment expenditures for activities that qualify for systematics but are environmentally unsustainable (non-systematic activities) (A.2)		15 091	11,5%	11,5%	-	-	-	-	-								-		
Total (A.1 + A.2)		15 091	11,5%	11,5%	-	-	-	-	-								36%		
B. NON-SYSTEMATIC ACTIVITIES																			
Turnover from non-systematically eligible activities (B)		116 553	88,5%																
Total (A + B)		131 645	100,0%																

Comarch Group - Percentage of operating expenses for products or services related to business activities in line with the systematic

Financial year 2024				Criteria for significant contribution						Criteria for the "do no serious harm" principle									
Economic activity (1)	Code or codes (2)	Operating expenses (3) PLN [000]	Percentage of operating expenditure, 2023(4) [%]	Climate change mitigation (5) [%]	Adaptation to climate change (6) [%]	Water and marine resources (7) [%]	Pollution (8) [%]	Closed loop economy (9) [%]	Biodiversity (10) [%]	Climate change mitigation (11) [Y/N]	Adaptation to climate change (12) [Y/N]	Water and marine resources (13) [Y/N]	Pollution (14) [Y/N]	Closed-loop economy (15) [Y/N]	Biodiversity (16) [Y/N]	Minimum guarantees (17) [Y/N]	Participation in activities in line with the systematic (A.1.) or qualifying for systematics (A.2.) Operating expenditure, 2023(18)	Category - Support activities (19) [E]	Category - Transition activities (20) [E]
A. ACTIVITIES ELIGIBLE FOR SYSTEMATICS																			
A.1. Types of environmentally sustainable activities (consistent with the systematics)																			
Operating expenditure for environmentally sustainable activities (consistent with the system) (A.1)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	T	-		
Including supporting	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	T	-	E	
Including in favour of the transition	-	-	-	-						-	-	-	-	-	-	T	-		T
A.2 Activities classifiable to the systematics, but not environmentally sustainable (activities not in accordance with the systematics)																			
8.1 Data processing, website management (hosting) and similar activities	CCM 8.1	8 344	13%	N	N/EL	N/EL	N/EL	N/EL	N/EL								-6%		
Operating expenditure on activities that qualify for systematics but are environmentally unsustainable (non-systematic activities) (A.2)		8 344	13%	13%	-	-	-	-	-								6%		
Total (A.1 + A.2)		8 344	13%	13%	-	-	-	-	-								6%		
B. NON-SYSTEMATIC ACTIVITIES																			
Operating expenditure from non-systematic activities (B)		54 899	87%																
Total (A + B)		63 243	100%																

6. Climate change

6.1. Transition plan for climate change mitigation

E1-1

The Comarch Group does not present a Transformation Plan (Transition Plan) in the 2024 Report. It intends to develop and disclose it within the next three years.

6.2. Material impacts, risks and opportunities and their interaction with strategy and business model

SBM-3

As a result of the Double Materiality Assessment, the Comarch Group has identified key climate-related issues significantly affecting both operational activities and the implementation of the adopted development strategy.

The most significant impacts were identified as:

- **Greenhouse gas emissions**, generated both within the company's own operations (e.g. business travel, operation of heating facilities, operation of generators) and throughout the value chain, in particular in the processes of hardware production by suppliers and the use of products sold.
- **Electricity consumption**, covering in-house operations (in particular the operation of office buildings and the operation and cooling of data centres) and the activities of supply chain partners.

In the context of the impact of climate change and the energy transition, the Comarch Group has also identified material physical risks and transitions related to the climate as part of its scenario analysis, described in detail in the IRO-1 disclosure. These include:

- **The risk of rising electricity costs** (transition risk) and **the risk of reduced energy availability** (physical risk) due to the effects of climate change, including fluctuations in network voltage and power failures.
- **Risk of operational downtime and disruption to IT services**, as well as the need for additional expenditure to provide alternative power supplies (physical risk).
- **The risk of lack of access to energy raw materials**, which may adversely affect the implementation of operational activities in line with strategic objectives and, in extreme cases, lead to the need to scale down operations (transition risk).

In parallel, the Comarch Group identified material development opportunities, including:

- **The production and development of software** to support companies in monitoring, reporting and reducing their carbon footprint, enabling the Group's offering to be aligned with growing customer requirements in the area of sustainability and ESG reporting.
- **Moderate reduction in operating costs** through increased use of renewable energy sources (RES), contributing to improved energy efficiency and increased resilience to energy price volatility.

An analysis of the resilience of the Comarch Group's strategy and business model in relation to climate change is detailed in chapter 3.3. *Material impacts, risks and opportunities and their interrelationship with the strategy and business model*.

6.3. Policies related to climate change mitigation and adaptation

E1-2

The Comarch Group does not currently have a formally adopted, uniform policy on climate change mitigation and adaptation to its consequences. The development and implementation of such a policy is planned by the end of 2025. However, there are other internal documents within the Group that cover activities in these areas.

Assumptions and objectives of ESG strategy

The purpose of the document is to set out the main directions of ESG and sustainable development activities for Comarch Group companies. The document also outlines the strategic quantitative and qualitative ESG goals that Comarch intends to pursue over a 5-year horizon.

The strategy applies to all entities within the Comarch Group, both in Poland and abroad, and covers all operational areas of the Group.

The results of this strategy are monitored on an ongoing basis, presented to management and published in the annual sustainability report.

The strategy is a public document, available on Comarch's official website. The full content of the document is available at: <https://www.comarch.pl/relacje-inwestorskie/lad-korporacyjny/>.

Integrated Management System Policy

The Integrated Management System Policy is the supreme document of the IMS. This policy contains all of the organisation's intentions and objectives regarding quality, environmental protection, occupational health and safety, energy management and information security, which are expressed in a formal manner by the top management, i.e. the Board of Directors of the parent company.

The Integrated Management System aims to ensure the proper, system-administered implementation of all business processes that affect the quality of products and services. The smooth operation of the system ensures that all processes are monitored in terms of effectiveness and efficiency, improved and adapted to constantly changing market and technological conditions and to changing customer requirements.

The IMS policy addresses the impacts, risks and opportunities identified through the due diligence process, including in the scenario analysis and materiality analysis. In particular, they include:

- **Impacts:** greenhouse gas emissions, energy consumption, resource consumption for IT equipment, waste, health and safety, information security incidents,
- **Risks:** climate change risks (physical and transitional), legal and reputational risks in terms of data protection and cyber-attacks,
- **Opportunities:** development of innovative and secure IT solutions to support carbon footprint calculations.

The Integrated Management System is certified at Comarch S.A., while its provisions apply to all Comarch Group companies.

The implementation of the Integrated Management System policy includes measures for quality, environment, health and safety, energy efficiency and information security. These processes are implemented by setting measurable objectives, systematically monitoring results and implementing improvement measures. Employee training, internal and external audits and cyclical management reviews reported to the Board of Directors are also carried out, ensuring that activities comply with applicable standards and company policies.

The policy is a public document, available on the official Comarch website. The full content of the document is available at: <https://www.comarch.pl/o-firmie/zrownowazony-biznes/polityka-jakosci>.

The Comarch Group's climate change mitigation and adaptation policies are an integral part of the Integrated Management System (IMS). The Integrated Management System in the Comarch Group includes, among others, environmental management (ISO 14001), energy management (ISO 50001) systems. As part of the IMS, environmental and energy policies are an essential tool in the implementation of **climate change mitigation and adaptation** activities.

6.4. Actions and resources in relation to climate change policies

E1-3

The Comarch Group consistently pursues an ESG strategy, integrating environmental aspects into its business activities. The Group undertakes numerous initiatives to minimise its environmental impact by implementing modern technologies to increase energy efficiency and promoting environmentally friendly attitudes among employees.

The Comarch Group is actively investing in renewable energy sources, aiming for at least 20% of its total consumption to come from its own renewable sources by 2027.

Among the major projects completed in the last year were:

- development of photovoltaic infrastructure - commissioning of a 36.9 kWp photovoltaic installation at a building on Puławska Street in Warsaw in April 2024,
- Comarch AG's signing of a contract for the purchase of 1,348,000 kWh of hydroelectric power that meets TÜV SÜD's stringent certification criteria for renewable energy production with delivery in 2025,
- continuing to replace lighting with energy-efficient LED solutions, in buildings owned by the Comarch Group,
- installation of reactive power compensators in Comarch Group buildings located in Kraków, Warsaw, Łódź and Rzeszów, which resulted in a reduction in energy losses,
- implementation of a building management system (BMS) for the SSE2 and SSE3 buildings in Kraków - enabling remote operation of all air handling units, temperature control and fault detection. Further expansion of the system with additional equipment is planned, including chillers and server room units,
- modernisation of the ventilation infrastructure in the SEZ2 building in Kraków - replacement of the motor and fan with a modern inverter fan, reducing energy consumption, increasing efficiency and reducing noise,
- modernisation of the swimming pool infrastructure in the SSE3 building in Kraków - replacing the roof over the pool with a new, better thermally insulated one, which reduced heating costs and improved ventilation on hot days,
- modernisation of the cooling system in the SSE4 building in Kraków - replacement of an old chiller with a modern, more energy-efficient model.

Sustainability investment plans for 2025 and beyond:

- further expansion of photovoltaic installations, including a planned capacity expansion of approximately 307 kWp in 2025,
- purchase of electricity from renewable sources,
- Continued replacement of lighting in office buildings,
- modernisation of the drives for the remaining air-handling units,
- Upgrading the heating in an office building on the Krakow campus,
- continuing the modernisation of the vehicle fleet, replacing conventional petrol and diesel vehicles with hybrid and electric vehicles.

All of the above, include the Comarch Group's own operations, with a particular focus on office buildings and IT infrastructure in Kraków, Warsaw, Łódź and Rzeszów. Investments in renewable energy also involve foreign companies (e.g. Comarch AG in Germany). These activities are aimed at directly reducing primary energy consumption, improving operational efficiency and decarbonising technical infrastructure.

Implemented measures cover 2024, while planned investment activities are foreseen for the following years. Longer-term projects (e.g. full decarbonisation of energy consumption) fit in with the goal of climate neutrality by 2040.

As part of its climate change mitigation activities, the Comarch Group has set GHG emission reduction targets and taken measures to achieve them. However, at the time of preparing this report, a full and verified assessment of the quantitative effects of these actions in the form of achieved and expected GHG emission reductions has not been carried out. Comarch plans to develop the scope and accuracy of monitoring of these indicators in subsequent reporting cycles.

The activities outlined do not require significant additional operational expenditure and capital expenditure over and above the resources already included in the activity budgeting process.

6.5. Targets related to climate change mitigation and adaptation

E1-4

The Comarch Group has not set formal sustainability targets in the sense of the ESRS. The Group monitors the effectiveness of its actions and adopted environmental policies within the framework of the Group's Sustainability Strategy.

The effectiveness of the measures implemented in the environmental area is monitored on the basis of annually collected operational data from all Comarch Group companies, both domestic and foreign. This process includes, inter alia, the monitoring of greenhouse gas emissions (scope 1 and 2), energy consumption, the share of energy from renewable sources, as well as the energy efficiency of infrastructure, in particular data centres. Environmental data is obtained and aggregated in accordance with certified environmental management (ISO 14001) and energy management (ISO 50001) systems.

A set of environmental objectives have been adopted as part of the Sustainability Strategy, providing a basis for assessing the effectiveness of the actions taken, including:

- A 20% reduction in CO₂ emissions per employee by 2027 (relative to 2021),
- Increase the share of energy from own renewable sources to 20% of total consumption by 2027,
- Continuous improvement in energy efficiency,
- The long-term goal is to achieve climate neutrality by 2040.

The Comarch Group's plans for the coming years include further reductions in CO₂ emissions, increasing the share of renewable energy and implementing modern technologies that will reduce its environmental footprint. As part of its commitment to climate issues, in September 2024, the Comarch Group joined the Science Based Targets (SBTi) initiative, which will help set new emission reduction targets that are in line with the latest scientific guidelines for tackling climate change.

The Comarch Group is working to improve its methodology for calculating its carbon footprint in order to monitor and reduce emissions even more accurately at each stage of its operations. Particular emphasis is being placed on expanding **Scope 3** emissions reporting, which will allow an even more precise analysis of the company's environmental impact and the development of more effective reduction strategies.

Over the next two years, the Group plans to review and update its CO₂ reduction targets so that they are fully compliant with SBTi requirements and in line with global standards for combating climate change. This will enable it to more effectively meet its commitments to minimise its environmental impact and achieve carbon neutrality in the long term. In parallel, work will be carried out on the development and implementation of the transformation plan.

6.6. Energy consumption and mix

E1-5

Electricity management is a key area for the Comarch Group that is essential both to ensure operational continuity and to meet the Group's climate impact reduction targets.

The table shows the actual energy consumption values and the composition of the energy mix for Comarch S.A. and the Comarch Group for 2024. The following metrics have been determined on the basis of actual consumption. The measurement of the meter has not been validated by an external body other than the assurance provider.

Energy consumption and energy mix	Unit	Comarch S.A.	Comarch Group
Total fossil energy consumption:	MWh	28250	41 176
Share of fossil sources in total energy consumption	%	98,78	99,16
Total energy consumption from nuclear sources	MWh	0	0
Share of nuclear sources in total energy consumption	%	0	0
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	0	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	0	0
The consumption of self-generated non-fuel renewable energy	MWh	349	349
Total renewable and low-carbon energy consumption	MWh	349	349
Share of renewable sources in total energy consumption	%	1,22	0,84
Total energy consumption	MWh	28 599	41 525

Energy intensity based on net revenue

According to Regulation (EC) No 1893/2006 of the European Parliament and of the Council, which defines the NACE sector classification, activities in selected sectors are considered to have a material impact on climate.

The Comarch Group's activities are classified in Section J: Information and Communication, which is not among the sectors considered to have a material impact on the climate.

Accordingly, the energy intensity ratio in relation to net revenues from activities in sectors with a material climate impact is not presented.

6.7. Gross Scopes 1, 2, 3 and Total GHG emissions

E1-6

Reporting limits for emissions

The organisational boundaries of the GHG emission calculations performed were established on the basis of operational control and included:

- 100% issuance of Comarch as the parent company,
- 100% of the issues of the subsidiaries that make up the Comarch Group.

Scope of reported emissions - accepted submissions, sources of data and emission factors

The report uses a methodology in line with the GHG Protocol, according to which emissions were reported in three scopes: Scope 1, Scope 2 and Scope 3.

Scope 1 presents direct emissions resulting from the combustion of fuels in stationary or mobile sources, as well as leaks from air-conditioning and refrigeration equipment. Fuel consumption data for the vehicle fleet, slow-moving equipment, machinery, generators and yachts (petrol, diesel, LPG) were used to calculate these

types of emissions. Fuel consumption (natural gas, fuel oil and LPG) in heating installations of buildings owned by Polish and foreign Comarch Group companies was also included. The emission factors necessary for the calculations were obtained from the DEFRA UK Government GHG Conversion Factors for Company Reporting (2024) database. GWP factors for HFCs are mainly based on the IPCC Fifth Report (AR5) for a 100-year time horizon, as required by the Paris Agreement. In some cases, values from AR4, AR6 or data from the EU F-gas regulations are used if values in AR5 are missing.

Scope 2 presents indirect emissions from the consumption of purchased electricity and heat. Both the Location-based method and the Market-based method were considered. The indices necessary to calculate emissions from this category using the location-based method were calculated on the basis of data contained in the report of the National Balancing and Emissions Management Centre (KOBIZE, 2024), on the basis of indices contained in the report of the Energy Regulatory Office - Thermal Power in Figures 2023 for Polish companies, and from the databases of The European Environment Agency (EEA), The Environmental Protection Agency (EPA), ADEME (Agence de la transition écologique), and The Umweltbundesamt (UBA) for foreign companies. The market-based method was used to calculate emissions using indices provided from suppliers and, for locations in the United States, the CO₂ emission factor for electricity based on average annual data in 2024 from the Electricity maps website.

Data for calculating Scope 1 and Scope 2 emissions was obtained from the administrative departments, including technical administration, fleet management, controlling and finance and accounting departments.

2024			
	Unit.	Comarch S.A.	Comarch Group
Scope 1 greenhouse gas emissions			
Gross Scope 1 GHG emissions (tCO ₂ eq)	t CO ₂ e	2 504	3 171
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	t CO ₂ e	0	0
Scope 2 greenhouse gas emissions			
Gross location-based Scope 2 GHG emissions (tCO ₂ eq)	t CO ₂ e	10 156	13 685
Gross market-based Scope 2 GHG emissions (tCO ₂ eq)	t CO ₂ e	13 487	17 734
Significant scope 3 GHG emissions			
Total Gross indirect (Scope 3) GHG emissions (tCO₂eq)	t CO ₂ e	224 476	
1 Purchased goods and services	t CO ₂ e	10 504	
2 Capital goods	t CO ₂ e	2 060	
3 Fuel and energy-related Activities (not included in Scope1 or Scope 2)	t CO ₂ e	56 051	
4 Upstream transport and distribution	t CO ₂ e	39 183	
5 Waste generated in operation	t CO ₂ e	5	
6 Business traveling	t CO ₂ e	1 079	
7 Employee commuting	t CO ₂ e	1 595	
8 Upstream leased assets	t CO ₂ e	9 132	
9 Downstream transportation	t CO ₂ e	10	

10 Processing of sold products	t CO2e	-	
11 Use of sold products	t CO2e	84 772	
12 End-of-life treatment of sold products	t CO2e	19 382	
13 Downstream leased assets	t CO2e	704	
14 Franchises	t CO2e	-	
15 Investments	t CO2e	-	
Total greenhouse gas emissions			
Total GHG emissions (location-based) (tCO2eq)	t CO2e	237 135,93	241 331,53
Total GHG emissions (market-based) (tCO2eq)	t CO2e	240 466,59	245 380,82

As part of Scope 3, the Comarch Group carried out a detailed assessment of the materiality of each category of emissions. For each relevant category, as detailed data as possible was collected from which emissions were estimated. The use of primary data was estimated at approximately 47% of Scope 3 emissions.

A materiality threshold of 4% of total Scope 3 emissions was adopted, which made it possible to exclude categories with a lower impact on the Comarch Group's total carbon footprint, while highlighting those that require more attention when defining GHG reduction targets across the Comarch Group's value chain. Biogenic emissions were not identified as part of the analysis carried out.

UPSTREAM		
	Materiality level [%]	Method of calculating emissions
1. purchased goods and services <i>Greenhouse gas emissions associated with the reporting company's purchase of goods and services. This includes all emissions related to the production and supply of products, raw materials, materials, as well as services that the company purchases as part of its operational activities.</i>	4,7	<p>The materiality analysis of this category was performed by collecting cost information on purchased goods and services from internal financial and accounting systems and then assigning the relevant emission factors from the Climatiq database. The materiality threshold within this category was assumed to be 90%, meaning that emissions were analysed and calculated based on 90% of all expenses incurred by the Comarch Group in the purchase of goods and services. The materiality of emissions calculated for this category ranked fifth among all Scope 3 categories. The category was classified as material.</p>
2. capital goods <i>Issues arising from investments in tangible assets and equipment that the company uses to manufacture products, provide services or sell, store and distribute goods.</i>	0,9	<p>The materiality analysis of this category was carried out in a manner analogous to that of category 1 - on the basis of data on the acquisition of fixed assets during the reporting period. Indicators from the Climatiq database were used for the calculation, and information was obtained from internal financial and accounting systems. 100% of the value of fixed assets acquired by the Comarch Group in this area was analysed. Emissions from this category represent less than 1% of the total Scope 3 emissions. The category was classified as insignificant.</p>
3. fuel and energy-related Activities (not included in Scope 1 or Scope 2) <i>Emissions related to the processes of raw material extraction, processing</i>	25,0	<p>Within the Comarch Group, emissions from this category were considered on the basis of the purchase of the following media and raw materials:</p> <ul style="list-style-type: none"> • Electricity, • Thermal energy,

<p>and transport to the places where fuels and energy are used, i.e. the processing plants that supply energy to the company (WTT). In addition, this category includes emissions from transmission and distribution in electricity and gas networks (T&D).</p>		<ul style="list-style-type: none"> • Petrol for the operation of the car fleet, • Diesel for the operation of the vehicle fleet, • Diesel for the operation of the yacht, • LPG for heating purposes, • Light fuel oil for heating purposes, • Diesel to power the generator set. <p>This category was considered for both Comarch-owned facilities and locations leased or rented, both in Poland and abroad. For the calculation of emissions for T&D processes in Poland, an index calculated on the basis of data contained in the KOBIZE Report was used. The sources of emission factors for T&D processes abroad were DEFRA and BEIS. For the calculation of emissions for T&D processes, emission factors obtained from the BEIS database were mostly used, and in individual cases from databases such as ADEME, CO2 Emissiefactoren and DISER.</p> <p>This category is the second most emissive category across Scope 3. The category is classified as significant.</p>
<p>4. upstream transport and distribution</p> <p><i>Emissions related to the transport of purchased or sold products, from suppliers and to customers respectively, to/from the reporting company.</i></p>	17,5	<p>Comarch has identified several types of transport that fall into this category:</p> <ul style="list-style-type: none"> • Purchased products transported to reporting company • Purchased products transported directly from the customer to the reporting company's supplier • Products sold <p>Transport was carried out by mass transport, with the help of courier companies. Reports were collected from the relevant internal departments containing information on the place of shipment and the destination of the consignments, as well as the estimated weight.</p> <p>Based on the data received, the average distances travelled by parcels bought or sold were estimated. In the few cases of incomplete data necessary for the estimates, average values derived from reports with complete data were used or based on assumptions. Based on information from the two main companies providing transport services to Comarch, on the type of cars and fuel used to transport parcels, an appropriate emission factor was selected for transports organised in Poland. Due to the impossibility of obtaining precise data on the types of vehicles used for international transport, in order to standardise calculations for shipments outside Poland, the emission factor for transports performed by air was adopted. The source of emission factors for both domestic and foreign transports was the DEFRA database. The category is the third most emissive in Scope 3 and was therefore considered relevant for reporting.</p>
<p>5. waste generated in operation</p> <p><i>Emissions related to the treatment and disposal of waste generated by the company during its operations.</i></p>	0,0	<p>Comarch's main waste streams include:</p> <ul style="list-style-type: none"> • electrical and electronic equipment, • mixed packaging waste, • medical waste. <p>Data on the mass of waste generated was obtained from the Waste Database (BDO). For each type of waste listed,</p>

		<p>an appropriate emission factor was applied. On the basis of information from the company collecting waste from the Comarch Group and on the basis of legal regulations, the method of disposal of waste generated by the Comarch Group in the reporting year was determined. It was determined that waste from the electrical and electronic equipment group and mixed packaging waste are 100% recycled. In the case of medical waste, 100% is incinerated. The sources of the indicators for electrical equipment and mixed packaging waste are the DEFRA database and for medical waste the ADEME database. As this category is responsible for less than 1% of Scope 3 emissions, it was considered not relevant for reporting.</p>
<p>6. business traveling <i>Issues related to Comarch employee business travel.</i></p>	0,5	<p>Within this category, four types of transport are specified in the Comarch Group:</p> <ul style="list-style-type: none"> • rail transport, • air transport, • public transport (bus, minibuses), • taxi services. <p>Emissions from this category result from business travel, both domestic and international. The most optimal method for estimating emissions from this category for the time being, in terms of data collection, was considered to be the cost method based on the expenses for the different modes of transport used during the business trip. Data on business trip costs was obtained from internal financial and accounting systems. Emission factors for the calculations were obtained from the EPA database. These coefficients give the amount of carbon dioxide emissions per unit value of a particular mode of transport, expressed in kilograms per US dollar, in relation to the purchase price of transport services (the so-called purchasing price). This category represents less than 1% of all Scope 3 emissions and was therefore considered insignificant.</p>
<p>7. employee commuting <i>Emissions related to employees' daily commute to the office.</i></p>	0,7	<p>The analysis of the relevance of this category was carried out on the basis of a survey on employee commuting among Comarch Group employees. The survey was prepared by the ESG Department in cooperation with the Employer Branding Department and made available on the internal company portal. It took into account aspects such as:</p> <ul style="list-style-type: none"> • the type of means of transport used, • the distance travelled between the place of residence and the place of work, • the time of year when rides take place, • the possibility of remote working or holidays during the year. <p>The survey collected approximately 517 responses, of which 1.8 per cent were considered invalid, mainly due to missing data. The remaining data were extrapolated using information on the total number of employees in the company in 2024.</p>

		Indicators from the DEFRA database were used to calculate emissions. Emissions from this category represent approximately 0.7% of the Group's total Scope 3 emissions. The category was considered insignificant.
8. upstream leased assets <i>Emissions related to assets leased by the company, in the upper supply chain, i.e. leased from other companies and used in the company's operations.</i>	4,1	<p>In the case of Comarch, these are mainly spaces in office facilities or entire buildings in Poland and abroad. These facilities, especially those abroad, are not directly controlled by the reporting company, so in many cases it was not feasible to collect accurate data on the consumption of utilities such as electricity or heating. For this reason, in the absence of actual data on the consumption of utilities, literature data contained in the report - "Environmental benchmarks for buildings" - JRC Technical Reports, showing emissions per unit area, was used to calculate emissions. In some cases, it was also necessary to adopt estimates of the surface area rented, as Comarch rents single desks or office space in several foreign locations. Recommendations in line with the European Agency for Safety and Health at Work guidelines were adopted, according to which the minimum surface area of an office workstation should be at least 6 m², using a representative value of 8 m² in the calculation. Data for this category was provided by the department responsible for administration and the administrators of the individual buildings. The emission factors for the conversion of electricity and heat used were derived from the same sources as the emission factors for the purchase of these utilities in Scope 2: the National Balancing and Emission Management Centre (KOBiZE) - for the purchase of electricity in Poland; the National and European Emission Factors for Electricity Consumption (NEEFE) and Electricity maps - for the purchase of electricity in locations abroad; the "Thermal Power in Numbers 2023" - URE report for the purchase of thermal energy in Poland, and the UBA and BEIS databases - for the purchase of thermal energy in foreign locations. This category represents 4.1% of all Scope 3 emissions. The category has been classified as material.</p>
DOWNSTREAM		
9. downstream transportation <i>Emissions related to the transport of products from the company to its customers after sale.</i>	0,0	<p>In this category, product shipments paid for by Comarch customers were taken into account. The data necessary to report emissions from this category were obtained from the relevant internal departments. In the few cases of lack of complete data necessary for estimations, average values derived from reports containing complete data were used, or assumptions were made. The emission factors for the calculations were obtained from the DEFRA database. Emissions from this category represent less than 1% of all Scope 3 emissions and therefore this category was considered to be insignificant.</p>
10. processing of products sold <i>Emissions resulting from the processing of sold intermediate</i>	0,0	<p>No calculations have been carried out within this category, due to the lack of available data that could be used to make such calculations. The products and services</p>

<p><i>products by third parties (e.g. manufacturers) after they have been sold by the reporting company. Intermediate products are those that require further processing, transformation or incorporation into another product prior to use and therefore result in emissions associated with their processing after sale by the reporting company but prior to use by the final consumer.</i></p>		<p>offered by the company primarily include its own software and IT services, which are provided as end solutions - ready for use by the customer, without the need for further processing, assembly or integration into physical products as part of production processes. In addition, the Comarch Group also offers third-party hardware and third-party software, which are also in the nature of end products, intended directly for use by customers. Accordingly, none of the products or services offered are classified as an intermediate product within the meaning of Category 10 Scope 3 under the GHG Protocol.</p>
<p>11. use of sold products <i>Emissions generated by customers when using products sold by the company.</i></p>	37,8	<p>Emissions in this category were estimated separately for desktop software, server software and physical hardware. Both Comarch's own products and third-party software and hardware were included in the analysis.</p> <p>For locally used software, assumptions were made regarding the number of users, duration of use, device power and lifetime. Due to the lack of complete data regarding the total number of users of programming sold, extrapolations were made based on the share of revenue from software sales in 2024.</p> <p>In the case of server software, a PUE indicator (1.5) was additionally applied, taking into account the energy consumption for cooling the server infrastructure. The average number of users per server was also assumed. Emissions were also calculated for the equipment sold, based on its power, lifetime and assumed service life. The assumed values were based on general knowledge of the operation and use of the physical equipment sold. The electricity emission factor from the IEA database was used for the calculations, due to the global reach of the Comarch Group's operations.</p> <p>Emissions from data transfer were also taken into account - the data required for the calculations were obtained from the department responsible for data centre management. The monthly data collected was extrapolated to annual values. The calculations included transfers carried out on both own and rented infrastructure. The emission factors were taken from the Google Cloud Platform.</p> <p>The final element was the issues related to cloud storage and data sharing, which were received from suppliers. This category proved to be the most issuable within Scope 3, accounting for 37.8% of the company's total issuance in this area.</p>
<p>12. end-of-life treatment of sold products <i>Emissions related to the end of life of the products sold by the company, i.e. the processes that take place at the end of their life, such as recycling, disposal or landfill.</i></p>	8,6	<p>In the context of Comarch, this category includes emissions resulting from the disposal of electronic equipment produced within the Comarch Group, as well as equipment purchased from third parties and subsequently resold. The data necessary for reporting on this category were obtained from the Logistics Department and from internal financial and accounting systems. The source of indicators for emissions calculations was the DEFRA database. Emissions were calculated based on the</p>

		estimated weight of products sold and the number of products sold. The total emissions from this category amount to 8.6% of all Scope 3 emissions, making it the fourth most emissive category in Scope 3.
13. downstream leased assets <i>Issues related to the operation of assets owned by the company (acting as lessor) that are leased to others during the reporting year.</i>	0,3	In the case of Comarch, these are mainly office space or entire buildings located in Poland. Data for calculating emissions from this category was provided by the Administration Department. The sources of emission factors were the KOBIZE and DEFRA databases, as well as data from the Energy Regulatory Office report. Emissions from this category represent less than 1% of all Scope 3 emissions, and were therefore considered insignificant.
14. franchises <i>Issues related to the activities of franchisees that operate under the reporting company's brand. Issues in this category cover the activities of companies operating under a franchise agreement that sell products or services under the franchisor's brand.</i>	0,0	Comarch does not operate a franchise-based business. The Group does not have franchisees that sell its products or services under its brand name, but offers its services and products directly to customers. Therefore, this category was considered immaterial and was excluded from Scope 3 issue reporting.
15. investments <i>Emissions related to the operations of companies, projects or assets in which the reporting company has invested. Emissions in this category include those resulting from financial investments in companies, funds or projects that may generate GHG emissions but over which the company has no operational control.</i>	0,0	Comarch does not engage in investment activities to the extent that they generate emissions related to investments in other companies or projects. The Group does not engage in financial investments that would have an impact on GHG emissions as part of its Scope 3 commitments. Furthermore, the lack of investments in assets that could be associated with large emissions makes this category irrelevant in the context of Comarch's total carbon footprint. For this reason, Category 15 'Investments' was considered irrelevant and excluded from Scope 3 emissions reporting.
	100	

In order to standardise the data to the units used in the emission factors, average exchange rates for 2024 have been applied, in line with those used in the preparation of the Comarch Group financial report.

Scope 1 and **Scope 2** emissions account for approximately **1.3%** and **5.7%** of the Group's total carbon footprint, respectively, according to the location-based method. **Scope 3** accounts for approximately **93%** of total emissions. Of all Scope 3 emission categories, six were considered significant as they collectively account for more than **97%** of Scope 3 emissions:

- Cat. 1: Purchased products and services - **4.7%**
- Cat. 3: T&D and WTT emissions - **25.0%**.
- Cat. 4: Upstream transport and distribution - **17.5%**
- Cat. 8: Leased senior assets - **4.1%**
- Cat. 11: Utilisation of products sold - **37.8%**
- Cat. 12: Processing of sold products at end-of-life - **8.6%**

In the context of the planned reduction measures, the company will particularly focus on the above areas.

Greenhouse gas intensity based on net revenue

The GHG intensity for Comarch S.A. and the Comarch Group is given in tonnes of carbon dioxide equivalent per net revenue. Revenue data is taken from point II. Consolidated Income Statement - from the Consolidated Financial Statements.

GHG intensity per net revenue	Unit.	Comarch S.A.	Comarch Group
Total GHG emissions (location-based) per net revenue (tCO ₂ eq/Monetary unit)	t eCO ₂ /thousand PLN	0,177	0,126
Total GHG emissions (market-based) per net revenue (tCO ₂ eq/Monetary unit)	t eCO ₂ /thousand PLN	0,179	0,128

All the metrics presented in the chapter have not been validated by an external body other than the assurance provider.

6.8. GHG removals and GHG mitigation projects financed through carbon credits

E1-7

In 2024, the Group has no greenhouse gas removal or mitigation projects funded with carbon credits.

6.9. Internal carbon pricing

E1-8

The Group does not use internal carbon pricing systems.

6.10. Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

E1-9

As part of the E1-9 disclosure, the Group has taken advantage of the transitional provision in the progressively implemented disclosure requirements legislation, which provides that this disclosure may be omitted in the first year of reporting.

7. Resource use and the circular economy

7.1. Policies related to resource use and circular economy

E5-1

The Comarch Group has not implemented a uniform policy related to the use of resources and the closed-loop economy (GOZ). There are other internal documents in the Group addressing GOZ issues. Key aspects are implemented through internal procedures and implemented management systems, including the ISO 14001 standard and indirectly through the ISO 50001 standard.

The Comarch Group also has in place and functioning procedures for dealing with waste contained in the IMS Policy described in chapter E1-2. Waste is collected selectively and in a way that prevents its negative impact on the environment. In terms of waste transport and neutralisation, the Comarch Group cooperates only with authorised entities that have the technical means and administrative decisions to manage the waste transferred to them in a way that is safe for people and the environment. Comarch Group companies operate under the Waste Electrical and Electronic Equipment Act, the Batteries and Accumulators Act and the Packaging and Packaging Waste Management Act.

7.2. Actions and resources related to resource use and circular economy

E5-2

As part of its day-to-day operations, the Comarch Group mainly generates waste associated with the operation of electrical and electronic equipment, which is subject to periodic depreciation and replacement.

Before equipment is classified as waste, each time it is assessed for its potential for further use in other Group units or for reuse by authorised third parties.

The Comarch Group ensures the organisation of the collection of waste electrical and electronic equipment and carries out selective waste management in accordance with current legislation.

Activities planned for the next few years include further standardisation and unification of procedures related to the recovery and reuse of equipment, the development of cooperation with recycling partners and an analysis of the feasibility of GOZ indicators for IT equipment.

These actions, both implemented and planned, aim to extend the life cycle of resources and reduce the generation of unnecessary waste.

The above activities are of a continuous nature, carried out on an operational basis in each reporting year. The activities cover all operational units of the Comarch Group in Poland and abroad, with a focus on locations where the technical and office infrastructure is located. The activities involve both internal administrative and IT departments as well as external partners specialising in waste management. These initiatives also involve employees, where environmental awareness and a responsible attitude to equipment use and resource management are promoted.

The activities outlined do not require significant additional operational expenditure and capital expenditure over and above the resources already included in the activity budgeting process.

7.3. Targets related to resource use and circular economy

E5-3

The Comarch Group has not set uniform, measurable targets related to resource use and the circular economy in ESRS terms.

The effectiveness of activities implemented in the area of closed-loop economy is monitored on the basis of annually collected operational data from all Polish Comarch Group companies. This process includes monitoring the amount and type of waste generated. Environmental data is obtained and aggregated in accordance with certified environmental management systems (ISO 14001).

As part of the Sustainability Strategy, a set of GOZ targets have been adopted as a basis for assessing the effectiveness of the actions taken, including:

- Reduce the amount of waste produced and manage it responsibly, including separate waste collection,
- Collection, recovery and recycling of introduced electronic equipment, packaging and batteries.

7.4. Resource inflows

E5-4

The nature of the Comarch Group's business, focused mainly on software development, cloud services, implementation and maintenance services, means that the Group does not directly use tangible resources such as raw materials or semi-finished products in a significant way. The goods produced by Comarch are mostly intangible in nature. Finished goods are created on a limited scale and represent only a marginal part of the Group's operational activities. The production processes in this respect are carried out in selected companies and do not have a significant impact on the Group's total resource consumption.

Accordingly, mainly purchased property, plant and equipment used in in-house operations, particularly in technical, office and data centre infrastructure, were considered as introduced resources. In 2024, key categories of introduced resources included:

- Servers,
- Laptops and computers,

- Monitors,
- Other equipment - other items of office equipment such as printers, routers, tablets and external drives - that complement the core IT infrastructure and support the Group's day-to-day operational activities are also included in this category.

Resources introduced to the Comarch Group:

	Unit	2024
Total weight of products introduced into the organisation	tone	557,56
Laptops and Computers	tone	5,93
Servers	tone	177,19
Monitors	tone	1,71
Other equipment	tone	372,73
Technical materials	tone	0
Biological materials	tone	0
Percentage of biological materials	%	0
Percentage of sustainably sourced materials sourced	%	0
Mass of reused or recycled components, products and secondary materials.	tone	0
Percentage of reused or recycled components, products and secondary materials	%	0

The figures for the weight of products introduced in 2024 have been estimated on the basis of the number of units of equipment purchased within the Comarch Group's own operations, according to information from internal systems. The weight of individual equipment was determined based on manufacturers' data - where possible, official technical specifications published on websites were used. In the absence of such information, the average weight of comparable products from a given manufacturer was assumed.

At this stage, the Comarch Group does not yet have an integrated system for collecting data on physical assets covering all Group companies. Therefore, the data presented relates only to companies registered in Poland. The Group is currently analysing the possibility to expand the scope of the collected information and plans to implement appropriate reporting mechanisms in subsequent reporting periods.

The metrics presented above have not been validated by an external body other than the assurance provider.

7.5. Resource outflows

E5-5

In its activities, the Comarch Group follows the European waste hierarchy, with the aim of achieving the maximum practical benefit from its products while generating the minimum amount of waste, consequently reducing the adverse effects on the environment. With regard to both its own needs and those of its customers, waste management is based primarily on the prevention of waste generation through reuse and extending its life cycle, as well as on recycling and recovery processes and, ultimately, on disposal. The Comarch Group's waste management complies with applicable legislation, mainly the Waste Act and implementing acts.

The Comarch Group, as a result of its non-industrial activities, generates municipal waste, i.e. waste related to the non-industrial activities of the company, generated as a result of the living activities of its employees, the composition of which is similar to waste generated in households. This waste is subject to separate collection and the municipality is responsible for its collection on the basis of the declaration submitted (in accordance with the Act on Maintaining Cleanliness and Order in Municipalities).

As a result of the company's activities, the Comarch Group generates non-hazardous waste and hazardous waste to which it applies uniform waste classification rules, in accordance with the applicable legislation. Data

on hazardous and non-hazardous waste generated by Comarch Group companies can be found in the Database on Products and Packaging and Waste Management (BDO), which is available at: www.bdo.mos.gov.pl.

All Polish Comarch Group companies engaged in activities that generate waste have been registered with BDO and have an individual registration number, assigned by the relevant provincial marshal. All waste recording obligations (waste transfer cards and waste record cards) and waste management reporting obligations incumbent on Comarch Group companies are performed exclusively in electronic form, through BDO.

The Comarch Group has procedures and instructions in place for dealing with waste. Waste is collected selectively and in a way that prevents its negative impact on the environment. Comarch Group companies, in the field of waste transport and collection, cooperate only with entities that have the relevant environmental decisions (permission to operate in the field of collection, transport, recovery) and fully assume responsibility for further handling of the transferred waste.

The table below shows the total weight of waste streams generated in the Polish Comarch Group companies that are relevant to the IT and Medical sectors. Data for the entire Comarch Group including foreign companies has not yet been collected. The Group is currently analysing the possibility to expand the scope of the information collected and plans to implement appropriate reporting mechanisms in future reporting periods.

Type of waste	Unit	2024*
IT sector	tone	13,857
Electrical and electronic equipment	tone	13,803
Batteries and accumulators	tone	0,054
Medical sector	tone	5,894
Medicines	tone	0,006
Other wastes that contain viable pathogenic micro-organisms or their toxins and other forms capable of transmitting genetic material which are known or reliably believed to cause disease in humans or animals	tone	5,888

* The types and quantities of waste generated were determined on the basis of data collected in the BDO register.

The largest percentage of the waste stream generated by the Comarch Group (approximately 63%) is waste electrical and electronic equipment (monitors, computers, laptops, etc.) (non-hazardous waste with waste code 16 02 14), resulting from the decommissioning and replacement of IT equipment that is used by employees in their daily duties as a working tool. Before the electrical and electronic equipment is classified as waste, it is assessed for possible further use within the Comarch Group or by external parties. Waste code 16 02 14 is transferred to a specialised company, where it is subjected to R12 recovery processes (in accordance with the Waste Act, R12: exchange of waste to be subjected to any of the processes listed under items R 1 - R 11), in an automated dismantling line, where advanced treatment processes result in high-quality products.

The next largest percentage share in the stream of waste generated by the Comarch Group (approximately 28%) is accounted for by medical waste (hazardous waste with waste code 18 01 03* and non-hazardous waste with waste code 18 01 09), generated in connection with the provision of healthcare services by Centrum Medyczne iMed24, which is part of Comarch Healthcare S.A. structures. Waste with waste codes 18 01 03* and 18 01 09 is handed over to a company specialising in the neutralisation of medical waste and is subject to the D10 neutralisation process (in accordance with the D10 Waste Act: thermal transformation on land), which involves the thermal transformation of waste in advanced installations that are a source of heat and electricity.

Waste	Unit	2024*
Total amount of hazardous waste for which disposal was avoided	tone	0,721
<i>preparation for re-use</i>	tone	0
<i>recycling</i>	tone	0
<i>other recovery processes</i>	tone	0,721
Total amount of non-hazardous waste for which disposal has been avoided	tone	14,37
<i>including preparation for re-use</i>	tone	0
<i>including recycling</i>	tone	0,023
<i>of which other recovery processes</i>	tone	14,347
Total amount of waste for which disposal was avoided	tone	15,091
Total quantity of hazardous waste sent for disposal	tone	5,888
<i>combustion</i>	tone	5,888
<i>storage</i>	tone	0
<i>other disposal processes</i>	tone	0
Total quantity of non-hazardous waste sent for disposal	tone	0,006
<i>combustion</i>	tone	0,006
<i>storage</i>	tone	0
<i>other disposal processes</i>	tone	0
Total amount of waste sent for disposal	tone	5,894
Total weight of waste	tone	20,985
Total quantity of hazardous waste	tone	6,609
Total weight of non-hazardous waste	tone	14,376
Total weight of radioactive waste	tone	0
Total weight of waste not recycled	tone	20,962
Percentage of waste not recycled	%	99,9

*The types and quantities of waste generated for the Polish companies have been determined on the basis of data collected in the BDO register, while information on how they are managed comes from companies responsible for waste collection and processing. Data for the entire Comarch Group including foreign companies has not been collected so far. The Group is currently analysing the possibility to expand the scope of collected information and plans to implement appropriate reporting mechanisms in subsequent reporting periods.

The metrics presented above have not been validated by an external body other than the assurance provider.

7.6. Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities

E5-6

As part of the E5-6 disclosure, the Group has taken advantage of the transitional provision in the progressively implemented disclosure requirements legislation, which provides that this disclosure may be omitted in the first year of reporting.

Society

8. Own workforce

8.1. Material impacts, risks and opportunities and their interaction with strategy and business model

SBM-3

In this report, the Comarch Group includes all its own employees, understood as all persons employed under a contract of employment, irrespective of the period for which they are employed, the position they hold or the number of hours they work, as well as non-employees, i.e. persons with sole proprietorships, with whom cooperation agreements, contracts for specific work or commissions have been concluded.

The Comarch Group employs staff in Poland and in over a dozen countries around the world, mainly under employment contracts. The employment is predominantly of IT specialists, including programmers, analysts, consultants and project managers. The Group also works with self-employed individuals and outsourced service providers - but the share of these forms of collaboration is marginal. The Group's operations have the greatest impact on directly employed staff.

No areas have been identified in the Comarch Group's operations where there may be risks of forced or child labour. No vulnerable groups have been identified among its workforce where the Group could have a greater impact.

Significant impacts, risks and opportunities related to the social area were identified in the double materiality analysis and were related to the Group's own operations.

The Comarch Group has identified one significant potential negative impact and one actual negative impact. These impacts extend to the Group's own employee resources and relate to:

1. **Diversity - the under-representation of women in technical and managerial positions**, resulting in a gender imbalance in the employment structure. This phenomenon is widespread and systemic - largely due to the nature of the IT industry and the structure of candidates available in the market. Nevertheless, the impact is considered important from an equal opportunities and promotion perspective.
2. **The existence of a wage gap between men and women**, due both to differences in gender representation in higher-paid technical jobs and possible differences in pay structures within occupational groups. The impact is widespread in nature. The Group is analysing pay data to identify and reduce this gap. This phenomenon is not due to conscious discrimination, but to market and structural conditions. The pay gap is mainly due to women's shorter work experience in IT and shorter tenure in the Comarch Group, which translates into lower average salaries. In groups of employees where women and men have comparable seniority and experience (e.g. in the area of administration), the level of salaries is equalised.

Positive influence on own employees is realised by ensuring appropriate employment conditions, including job stability, market-based salaries and access to fringe benefits. A detailed description of the activities resulting in a positive impact is described in section 8.5. *Taking action on significant impacts on own staff resources and applying approaches to manage significant risks and opportunities related to own staff resources and the effectiveness of these actions.*

As part of the double materiality assessment, a risk was identified related to the potential loss of employees with key knowledge and competencies. This risk arises from the possibility of the departure of highly qualified professionals whose unique skills are essential to maintain competitiveness and ensure operational continuity. In addition, an insufficient number of available staff resources remains a significant risk, which may result in delays in project implementation and a reduction in the quality of services provided.

8.2. Policies related to own workforce

S1-1

Working conditions

In the Comarch Group, the rules concerning the organisation of work and the rights and obligations of the employer and employees are defined by: *Work Regulations* and *Remote Work Regulations*. These regulations, drawn up on the basis of the Labour Code, and apply to all persons employed under an employment contract. The Labour Regulations are in place in all Polish companies and selected foreign companies, which together account for 97% of total employment in the Group. Remote Work Regulations are in place in most Polish and foreign companies, which together account for 91% of total employment in the Group.

The Labour Regulations and the Remote Working Regulations translate into the management of significant impacts in terms of working conditions, covering issues such as working time, ensuring job security, work-life balance. These regulations, are based on the provisions of national labour law and comply with internal organisational standards.

The purpose of the Regulations adopted is to ensure lawful, safe, fair and transparent working conditions that promote work-life balance and enhance employee well-being, and to manage the Group's impact on its own employee resources in compliance with applicable laws and internal standards.

The scope of the documents includes, inter alia: the organisation of working time, the procedure for excusing absences, pay and bonus schemes, rules on the use of leave, obligations relating to occupational health and safety (OHS), protection of personal data and respect for the principle of equal treatment and parental rights.

Implementation of the principles set out in the Rules is achieved through formal familiarisation of employees with its content during the onboarding process, ongoing training (including on health and safety and personal data protection) and by providing electronic access to documents via the staff intranet. Human resources departments and heads of organisational units are responsible for implementation and compliance.

The highest level in the organisation that is responsible for implementing the Work Regulations and the Remote Working Regulations is the Management Board of the relevant Comarch Group company.

The effectiveness of the implementation of the rules set out in the Regulations is monitored by, among other things, analysing turnover rates, absenteeism, the number of reports of violations and the results of employee satisfaction surveys.

Adequate wages

The Comarch Group Employee Remuneration Regulations define salaries and other work-related benefits and the rules for awarding them. These regulations, drawn up on the basis of the Labour Code, apply to all persons employed on the basis of an employment contract. A separate document or as part of the work regulations has been adopted in all Polish companies and most foreign companies, which together account for 94% of the Group's total employment.

The scope of the regulations includes information on basic salary, salary changes, bonus rules, holiday pay, temporary disability pay, deductions, retirement or disability allowance, expenses and special allowances.

The content of the Regulations translates into the management of significant impacts in terms of ensuring adequate pay and gender equality and pay for work of equal value. The objective of the Regulations is to apply consistent, transparent and non-discriminatory remuneration principles supports the elimination of the pay gap and the implementation of the principles of fair treatment, contributing to strengthening equal opportunities in the workplace and enhancing employees' confidence in the remuneration system.

The objective of the Regulations is to ensure a fair, transparent and motivating remuneration system that supports the organisation's strategic objectives, enhances employee engagement, promotes the principle of equal remuneration and ensures compliance with applicable legislation.

All decisions regarding employee remuneration are taken by the Boards of Directors of the individual Comarch Group companies, while the HR departments provide explanations on behalf of the employer regarding the application of the applicable regulations. The regulations are made available to employees in internal systems and discussed during onboarding, and employees are provided with constant access to their up-to-date content.

The highest level in the organisation that is responsible for the implementation of the Remuneration Regulations is the Management Board of the relevant Comarch Group company.

The effectiveness of the remuneration system is monitored, among other things, by analysing staff turnover, the level of employee engagement and the results of periodic appraisals.

Comarch Group Code of Ethics

The aim of the Comarch Group Code of Ethics is to promote and ensure adherence to the ethical values that underpin the Group's organisational culture. This document serves as a model of conduct for Comarch Group employees in relation to colleagues, superiors, customers, partners and local communities, both in business and non-business relations.

The Code is aimed at shaping an organisational culture based on ethical and moral values, building trust both within the organisation and in relations with clients, business partners and the local and international community, and ensuring compliance with applicable regulations, laws, recognised international norms and standards, as well as acting in accordance with ethical standards within the Comarch Group's activities.

Relevant areas of influence addressed by the Code of Ethics include:

1. **Employment security** - The Comarch Group's Code of Ethics supports the creation of a stable and safe working environment in which employees' rights; applicable labour laws and international labour and human rights standards are respected. In line with the Code, the Group ensures decent employment conditions, regularly paid wages, compliance with health and safety regulations and protection against unjustified dismissal, which fosters mutual trust and employee loyalty towards the organisation.
2. **Prevention of violence and harassment in the workplace** - The Code establishes standards of ethical behaviour, fostering a culture of mutual respect and non-discrimination. As a normative document, it provides a basis for preventing incidents of harassment, verbal violence or bullying, while also supporting a system for reporting and responding to unethical behaviour.
3. **Diversity** - by promoting equal treatment, respect for employees' different views, backgrounds and identities, the Code supports efforts to increase diversity in the workplace and build an inclusive organisational culture.
4. **Social dialogue** - The Comarch Group Code of Ethics recognises the right of employees to freely associate and engage in collective representation. According to the code, the Group "engages in dialogue with elected councils of employee representatives".

The Code of Ethics is in force in all Comarch Group companies and applies to all employees regardless of their position and the nature of their contract Every employee, collaborator and representative of the Comarch Group

is obliged to familiarise themselves with and comply with the principles contained in the Code of Ethics. This forms part of the training made available electronically as part of the Integrated Management System training, which is compulsory for all Comarch employees every five years. The training ends with a compulsory examination thanks to which it is possible to monitor the knowledge acquired by employees on an ongoing basis with regard to the topics presented during the training.

The Code of Ethics is a public document and is made available to employees through the intranet and outreach activities carried out by the Internet and Internal Communications Department. It is also promoted by the Quality and Health and Safety Department and the Compliance and Internal Audit Department. Employees are made aware of its content during onboarding and training. Activities to promote ethics, such as information campaigns, training and consultations, are carried out on an ongoing basis.

The Comarch Group Code of Ethics is available on the Company's official website in Polish: <https://www.comarch.pl/o-firmie/zrownowazony-biznes/kodeks-etyczny/> and English: <https://www.comarch.com/company/code-of-conduct/>.

The responsibilities of the Compliance and Internal Audit Department include:

- supporting employees in complying with the Code of Ethics,
- promoting the idea of a Code of Ethics within the company,
- updating the content of the Code of Ethics.

The highest level in the organisation that is responsible for the implementation of the Code of Ethics is the Management Board of Comarch S.A.

The principles contained in the Code of Ethics are regularly evaluated and its content is periodically reviewed and updated. Employees have the opportunity to raise comments and interpretation issues, which are dealt with by the Compliance and Internal Audit Department.

Diversity

The objective of the Diversity Policy at Comarch Group is to actively promote an organisational culture based on respect, inclusion and equal opportunities, while countering any form of discrimination. The policy aims to create an open and bias-free working environment and to foster diversity among all employees, executives, and members of management and supervisory bodies.

The policy promotes an open and inclusive working environment, free of barriers and prejudices. The Policy represents the Comarch Group's commitment to ensure that there is an equivalent proportion of women and men in the performance of management and supervisory functions across the businesses. In the document you can see statistics on the participation of women and men in Group management and data on the gender pay gap.

The policy applies to all Comarch Group companies and all employees, regardless of their form of employment, as well as to members of management and supervisory boards.

The highest level in the organisation that is responsible for the implementation of the Diversity Policy is the Management Board of Comarch S.A.

The implementation of the policy is monitored by, inter alia, analysing the employment structure, including the representation of women and men at different organisational levels, promotion rates, availability of training,

complaints and reports of equality violations. The results of monitoring are used to identify areas for improvement.

Training and skills development

The Comarch Group does not have a formally implemented separate training policy - the process of employee competence development is carried out on the basis of the training procedure in force. The Comarch Group's training procedure is closely related to the company's strategy and is based on continuous improvement of employees' professional qualifications through various forms of education, such as stationary and remote training (e-learning). The purpose of the procedure is to define the principles of conduct in the scope of improving employee qualifications through various forms of education, as well as supporting the development of employees' professional competences and adjusting their qualifications to the changing technological and strategic requirements of the organisation. The procedure defines the principles according to which Comarch Group employees may improve their professional qualifications.

The procedure applies to employees on employment/civil law contracts in Polish Comarch Group companies. Training is organised both internally by the Training Centre and by external providers. Verification of acquired knowledge takes place in the form of examinations, which are carried out directly by technology providers or independent examination operators.

The Training Centre is responsible for the implementation of the procedure and its operational implementation. The analysis of training needs rests primarily with the heads of the organisational units. Training is tailored to individual job needs and career paths.

The procedure is an internal document, made available to all employees via the intranet.

The effectiveness of the procedure's implementation is assessed by analysing training participation rates, the results of certification examinations, progress in the training application and the professional efficiency of employees. The conclusions of the monitoring are used to update and improve the training offer, in order to adapt it to the changing competence needs and strategic objectives of the Group. The procedure is reviewed periodically to ensure that it is up-to-date and in line with the organisation's strategy.

Health and safety at work

The Integrated Management System, includes procedures and instructions applied in all Comarch Group companies and towards all forms of employment. The IMS is subject to cyclical external audits only at Comarch S.A. in order to maintain certification. It is described in detail in chapter E1-1.

A coherent and comprehensive approach to managing occupational safety is presented in the form of a Health and Safety Policy, developed as part of the IMS Policy, the scope of which includes:

- prevention of accidents and occupational diseases by ensuring safe and hygienic working conditions and by eliminating hazards and reducing the risks associated with them,
- meeting legal and other health and safety requirements,
- integrate H&S issues into the organisation's vision, mission and strategic objectives, thereby increasing their impact on the company culture,
- increasing top management commitment to health and safety,
- consultation and participation of workers or workers' representatives in health and safety activities,
- management of the risks and opportunities arising from the operation of the health and safety management system, as well as its continuous improvement.

Strategic oversight of the IMS Policy is the responsibility of the top management, i.e. the Board of Directors, while ongoing implementation, monitoring and development is the responsibility of the **Health and Safety**

Department, in cooperation with the Quality Department, HR Department, Administration Department, as well as other operational business units.

The IMS policy is available to stakeholders on internal and external websites, as well as sent via email each time a request is made.

Implementation of the policy is monitored through:

- internal audits (carried out by internal auditors in accordance with the adopted schedule) and external audits (carried out annually by an external accreditation body - in 2024 this was the Polish Centre for Testing and Certification S.A.) within the framework of the functioning IMS, the purpose of which is to assess the effectiveness and compliance of the implemented management systems (including ISO 45001) with the requirements, identify areas for improvement and ensure that the system operates in accordance with the assumptions and regulations,
- annual Health and Safety Survey,
- a register of accident incidents, including occupational accidents and near-misses, as well as occupational diseases and suspicions of such diseases,
- ongoing verification of compliance with legislation and normative requirements,
- taking into account employee suggestions on health, safety and ergonomics.

Personnel policy

The main objective of Comarch CG's Human Resources Policy is to strategically manage human resources in order to support the company's growth and success, build a strong value-based organisational culture and ensure employee development and engagement.

HR Policy, presents the Comarch Group's strategy in the area of human resources management. It describes the role of the HR department, investments in employees, efficiency measures for global projects and remuneration principles. It emphasises the importance of human capital for the Group's success, investment in competence development and the creation of a safe working environment. The HR Policy also discusses the structure of the HR function, including the role of HR Partners and HR Departments in Poland and abroad, as well as initiatives related to recruitment, employer branding and cooperation with universities. The policy also emphasises the importance of ethical conduct, workplace safety, human rights and work-life balance for employees.

The policy applies to all Comarch Group companies - both in Poland and abroad - and addresses all aspects of personnel management, regardless of the form of employment.

Top management, i.e. the Board of Directors, is responsible for strategic oversight, while HR teams in individual Group companies, under the supervision of central HR and with the participation of HR Partners, are responsible for the implementation and coordination of the HR Policy.

The procedure is an internal document, made available to all employees via the intranet.

Policy effectiveness is assessed by:

- staff turnover and retention rates,
- level of employee involvement and satisfaction (surveys),
- analysis of the achievement of development and training objectives,
- results of recruitment and employer branding processes,
- regularly reviewing the policy in the light of changing organisational needs, market trends and regulatory requirements.

Significant areas of influence addressed by the HR Policy include:

1. **Adequate pay** - The Comarch Group's HR policy supports the provision of fair and competitive remuneration that reflects the nature of the work performed, the level of experience, individual performance and the employee's commitment.
2. **Job security** - The Comarch Group's HR policy supports the creation of a stable, ethical and safe working environment in which human rights, labour standards and the principles of mutual respect and responsibility are respected. The Group is committed to the safety and well-being of employees as part of the Integrated Management System. Continuous efforts are made to improve working conditions, in line with health and safety requirements, and high standards in this area are confirmed by, among other things, a certificate in accordance with the PN-N 18001:2004 standard.

Respect for human rights

The Comarch Group does not have a separate policy on respect for human rights, but these issues have been incorporated into other internal regulations, in particular the Code of Ethics, which is the main document defining the organisation's approach to ethical, social and legal issues, applicable to all Group companies.

The principles adopted take into account compliance with internationally recognised instruments, including:

- UN Guiding Principles on Business and Human Rights,
- International Labour Organisation Declaration on Fundamental Principles and Rights at Work,
- OECD Guidelines for Multinational Enterprises.

The Employee Own Resources Policy is an integral part of the Code of Ethics. The Code has been approved at the highest level of the company. It is based on the knowledge and experience accumulated within the Comarch Group and includes the Group's human rights expectations towards its own employee resources and business partners. The Code is publicly available on Comarch's website.

The Comarch Group declares its respect for the human rights, including the labour rights, of those belonging to its own workforce. The Code of Ethics in this regard includes respect for personal dignity, freedom from discrimination, freedom of association, as well as the right to fair remuneration and safe working conditions. The Code of Ethics also refers to compliance with the prohibition of human trafficking, forced labour and child labour.

In terms of equal treatment and inclusion, the Comarch Group implements actions through its Diversity Policy, which includes commitments to eliminate all forms of discrimination, including harassment, and to promote equal opportunities. The document takes into account diversity based on: gender, age, national and ethnic origin, sexual orientation, gender identity, disability, religion, political opinion and other characteristics protected by national and EU laws.

The Group also has commitments to positive action to support the integration of people at risk of exclusion, including, among others, women in leadership roles and people with disabilities. Policies are implemented through an onboarding system, regular training, awareness campaigns, as well as whistleblowing mechanisms and consultation with Compliance and Internal Audit.

Compliance is supervised through internal control mechanisms, a system for reporting unethical behaviour, analysis of reports and periodic policy reviews. These processes support the identification of possible violations and the implementation of appropriate corrective measures, as well as the ongoing monitoring of risks related to compliance with human and labour rights in the Comarch Group.

The Comarch Group has an accident prevention policy (described above in the section on health and safety) and a system to manage them (the actions taken under this system are described in S1-4).

8.3. Processes for engaging with own workers and workers' representatives about impacts

S1-2

The Comarch Group does not have a formalised process for collaborating with its own employee resources. Various organisational units are responsible for communication and cooperation with

employees according to their competences, in particular: Human Resources Department, HR Department and Quality Department. At the operational level, responsibility for cooperation with employees is assigned directly to managers and directors responsible for subordinate organisational units. The process of cooperation with employees is based on direct communication and taking into account the voice of employees in operational decisions. In addition, employees can express their opinions and demands through Employee Representatives, elected through a democratic process every two years, most recently in March 2024.

The employee engagement process covers issues of identified significant Comarch Group influence in the area of working conditions.

The Comarch Group involves employees in key decision-making stages and processes affecting working conditions. This includes regulatory issues such as the selection of the institution that manages Employee Equity Plans, the introduction of hybrid working, changes to remote working regulations, regulations on sobriety checks in the workplace, and consultations on changes to medical care for employees.

In addition, employee engagement is also implemented through annual periodic interviews and anonymous surveys that allow employees to ask questions. The opinions reported by employees are treated as an important source of information that enables management to make ongoing decisions.

At the date of the report, the Comarch Group does not have global framework agreements with employee representatives. Nevertheless, social dialogue is conducted on a principled and voluntary basis, and participatory mechanisms include both formal tools (statutory consultations) and informal tools (feedback channels).

In 2024, the Group's activities in the aforementioned area did not require significant financial or human resources.

8.4. Processes to remediate negative impacts and channels for own workers to raise concerns

S1-3

The Comarch Group monitors the impact of its activities on its own employee resources through the processes in place to enable its own employees to raise their concerns or needs. In particular, the following mechanisms are in place:

- **Anonymous whistleblowing channels**, including discrimination as described in detail under chapter G1-1, enabling employees to communicate whistleblowing,
- **Periodic appraisal carried out at least once a year**, where employees have the opportunity to express their opinions, raise any concerns or development needs,
- **Exit interviews**, conducted with employees leaving the partnership to identify areas for improvement,
- **Ongoing dialogue and consultation with employee representatives**, allowing for comments and proposals on working conditions, benefits and regulations, and ensuring that the voice of employees is included in operational decision-making,
- **Ability to raise concerns directly with superiors**, especially in the event of irregularities in employment or working conditions,
- **Dedicated email channels for selected areas, such as Health and Safety, Quality or Security**, handled directly by staff in the relevant departments.

Employees are made aware of the existence of reporting channels through email communications and the intranet.

In 2024, the Comarch Group did not find that any of the reported incidents qualified as a case of discrimination.

The Comarch Group has a grievance mechanism for dealing with employee issues as described under section G1-1.

8.5. Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

S1-4

Secure employment

The key measures implemented by the Comarch Group are aimed at ensuring stable and attractive working conditions for employees. In Comarch S.A. and in the entire Comarch Group, employment contracts are the dominant form of employment. The duration of the contract depends on the length of service and the nature of the duties performed. Other forms of employment are used only in justified situations, such as the need to reconcile professional work with education or the performance of tasks of a temporary nature. The Group monitors employee turnover - data are collected quantitatively (turnover rate) and qualitatively (reasons for leaving), and the results are analysed by HR departments. All the activities described relate to the Group's own employees and are ongoing and implemented as part of a sustainable human capital management strategy. The expected outcome of these activities is a reduction in the voluntary turnover rate, an increase in employee satisfaction and greater stability of teams implementing projects for clients. *The way in which the effectiveness of these activities is tracked and evaluated is presented within section S1-6".*

The Group has not identified any significant negative impacts regarding job security.

Working time

In terms of working time organisation, the Comarch Group applies solutions that enable work to be performed in a flexible manner, tailored to the individual needs of employees by means of remote work on selected days of the week, flexible working hours, and technological support that includes secured VPN connections and assistance from IT teams in terms of configuring equipment and solving current technical problems, enabling tasks to be performed effectively outside of the office. The vast majority of companies have remote working regulations in place, allowing for out-of-office working on an agreed basis with the employer. For positions requiring stationary presence, rules are applied to take into account the specific nature of the work. In the Group, a task-based working time system is in force in accordance with the Work Regulations. In this model, it is the performance of the assigned duties that is crucial, rather than a strict timeframe for their completion.

The solutions described relate to the Group's own employees, i.e. the person on a contract of employment, and were applied in the reporting year and are a permanent element of the organisational model that the Group plans to continue and develop in future years. The way in which the effectiveness of these measures is tracked and evaluated includes, among other things, analysis of the level of use of remote working, employee satisfaction surveys and monitoring of absenteeism and turnover rates. Details of the monitoring are set out in section S1-6.

Adequate wages

The amount of remuneration is determined by the employer through negotiations with the employee taking into account the salary levels of employees in similar jobs with comparable qualifications and work efficiency. The employer takes into account the employee's appraisal, which provides regular feedback on the goals achieved. The employer periodically reviews salary levels for specific positions comparing these levels to the labour market.

The Comarch Group offers employees a system of non-wage benefits and perks to complement their remuneration package. As part of benefits in domestic companies, benefits include private medical care - access to additional medical packages is provided to those employed under an employment contract. In foreign companies, medical packages are offered where the level of public healthcare is limited, taking into account local regulations and practices in the relevant market. In addition, employees can benefit from Multisport cards or access to the sports and recreation infrastructure of the recreation centre in Kraków, as well as a system of discounts covering, among others, cultural events and insurance products.

The measures described relate to the Group's own employees, i.e., those with employment contracts, and were implemented in the reporting year and will continue in future years as a permanent part of the Group's approach to managing employee remuneration and welfare.

How to track and evaluate the effectiveness of these measures is presented within Chapter S1-10.

Social dialogue

Employee Representatives have been appointed at Comarch S.A. and function on the basis of the Agreement concluded in Krakow on 24 May 2006 and the Act of 7 April 2006 on Informing and Consulting Employees (Journal of Laws 2006 No. 79, item 550, as amended). Employee representatives are elected from among all employees, employed under an employment contract. The election is carried out by the Company's employees every 2 years. The last election was held in March 2024. The elected Employee Representatives are part of the post-accident teams and participate in consultations conducted by the Employer, as well as the Health and Safety Committees. Among the more important of these were consultations on the selection of the institution managing the Employees' Capital Plans (PPK) (2019), the company's rules of operation and work during a pandemic (2020), amendments to the work regulations in connection with the introduction of hybrid work and the abandonment of the mandatory 30-minute break during work (2021), consultations on changes to the Labour Code regarding remote working and sobriety checks in the workplace and on amending the Remote Working Regulations (2023), consultations on changes to medical care for employees (2024). In 2025, employee representatives were included in the consultation of the Personnel Policy and, in accordance with the Whistleblower Protection Act, also the procedure for reporting and violations of the law.

Dialogue with employees also takes place through:

- anonymous questionnaires that allow people to freely express their opinions, make suggestions and ask questions,
- meetings between members of the management board and employees in the various sectors, are organised periodically in the form of information and dialogue sessions, both onsite and online. Their purpose is to provide direct information on the Group's strategy, financial performance, key projects and planned organisational changes, and to give employees the opportunity to ask questions and express their opinions. These meetings are held at least once a year or when major changes are implemented.
- internal communication via the Intranet and regular email communications, which include, among other things, information on the Group's current activities and initiatives, organisational changes, available benefits, professional development opportunities, as well as company events and ESG activities. Communications are published on a weekly basis or as operational needs dictate, while the Intranet acts as a constantly updated source of knowledge for employees.

Health and safety at work



In order to ensure uniform occupational safety standards, the Group's units operate an occupational health and safety management system compliant with the requirements of the PN-EN ISO 45001 standard, implemented and maintained as part of the Integrated Management System. At Comarch S.A., this system is subject to regular external audits to verify its compliance with certification requirements and to ensure continuous improvement.

At Comarch S.A., in line with the requirements of ISO 45001 in the area of Occupational Health and Safety (OH&S) 2024, the following measures have been taken:

- purchase of phantoms, AED equipment and staff participation in a first aid instructor course,

- retrofitting workstations with equipment to improve the ergonomics of computer work, i.e. standing desks and chairs adapted to the anthropometric features of the employee.
- monitoring, recommendations and guidelines from scientific/research bodies in the fields of occupational health and safety, ergonomics, environmental protection and fire protection, and their implementation.
- promoting health and safety at work, ergonomics, environmental protection and fire protection, e.g. as part of the First Step programme for new employees and through articles published on internal pages (e.g. rules for safe cycling), organising blood donation campaigns and DKMS.

As part of the promotion of a healthy lifestyle, there were also regular health-promoting activities organised for employees in Kraków - including 'Healthy Body' exercise classes and yoga sessions, organised on the company premises and tailored to the needs of office workers.

All of the above activities are continuous and are planned to be implemented in the short term (current year) and in the medium term (annual review and update of programmes).

How to track and evaluate the effectiveness of these measures is presented within Chapter S1-14.



Training and skills development

In terms of the development of professional competences, the Comarch Group continues its policy of supporting the education and qualification of its employees. The programme of internships and apprenticeships for university students and graduates is also systematically developed. A key role in the competence development system is played by the Comarch Training Centre, which offers specialised training and IT and business consultations at every level of advancement, both as part of internal training addressed to Comarch Group employees and offered to a wide range of external clients. The Comarch Training Centre benefits from the Comarch Group's nearly 30 years of experience as a knowledge-based organisation. The wide range of trainings for Comarch Group employees includes, among others, trainings in soft skills, such as effective communication, assertive work with customers or managing emotions in the work environment, managerial trainings and those dedicated to project management. The offer also includes technical and industry-specific courses, developing knowledge in the areas of processes, tools and technologies used in everyday work. Thanks to the remote training formula, participants can attend classes regardless of their location.

Competency development activities were implemented during the reporting year, are continuous and form part of the Group's long-term approach to supporting human capital development. They are planned to continue in future years. The expected outcome is an increase in the qualification level of employees, a better alignment of competencies with project needs and an increase in business efficiency.

How to track and evaluate the effectiveness of these measures is presented within Chapter S1-13.

Measures against violence and harassment in the workplace

The actions implemented to prevent violence and harassment at work are based on the Code of Ethics in force, which defines the basic organisational values and standards of conduct applicable to all employees, regardless of their position. The actions carried out at Comarch in 2024 are preventive in nature and include providing access to educational materials, presentations and training courses posted on internal platforms aimed at building awareness and promoting attitudes in line with organisational values.

The Group also has mechanisms in place to enable anonymous and safe reporting of potential violations. Employees have access to dedicated whistleblowing channels which are described within the framework of

chapters S1-3 and G1-1. The implementation of a formal Anti-Discrimination and Anti-Bullying Policy in the Comarch Group, took place in the first half of 2025.

All of the above activities are continuous and are planned to be implemented in the short term (current year) and in the medium term (regular reviews of content, training and evaluations of the effectiveness of reporting mechanisms).

The way in which the effectiveness of these measures is tracked and evaluated is presented within Chapters S1-3, S1-13 and G1-1 and includes, inter alia, an analysis of the number of notifications, the level of completion of mandatory training, an assessment of the level of confidence in the notification channels and a review of the effectiveness of corrective actions.

Diversity

The following initiatives are planned as part of the activities aimed at addressing the identified disparities:

- launching development and leadership programmes for women to strengthen their competences and prepare them to take on leadership roles,
- Promoting the theme of diversity in internal communications and employer branding activities, in order to build awareness and employee involvement in shaping an inclusive working environment.

The above-mentioned planned activities cover all employees of the Comarch Group. The activities are planned to be implemented in the coming years and are aimed at systemically increasing the level of diversity in the Comarch Group, with a particular focus on strengthening the representation of women in managerial and specialist positions. These activities serve to eliminate structural and cultural barriers that may limit equal opportunities for professional development and aim to create an inclusive, fair working environment in which all employees - regardless of gender - have equal access to development and promotion opportunities.

In 2024, the Comarch Group participated in the TECH HER WAY conference dedicated to promoting the IT industry among women. Participation in the conference was aimed at presenting career paths and supporting diversity in the technology industry. This activity was a one-off and was implemented as a local industry event involving the local community and potential employees.

Work-life balance

The Comarch Group in 2024 has been taking measures to support the health, well-being and work-life balance of its employees. These initiatives are implemented in a continuous and systemic manner, taking into account the needs of different employee groups:

- flexible working arrangements, such as hybrid working and flexible start/end times,
- the introduction of psychological and health support programmes, including, for example, access to specialist consultations (including, as part of the services of imed24's own Medical Centre),
- organising workshops and health campaigns to raise awareness of preventive health care,
- Promoting inclusive groups and team-building activities (e.g. annual Megapicnic for employees with their families, sports events around sports organised by the EB team, two hours for the family - opportunity to leave work early),
- private health care for employees and their families,
- a leisure complex with a swimming pool and gym available to employees and their families.

The aim of the Comarch Group's activities in the area of work-life balance is to permanently increase the well-being of employees by implementing solutions enabling flexible work organisation, promoting a healthy lifestyle and supporting family relations and team integration. The scope of initiatives covers all Comarch Group companies and applies to all employees with an employment contract. The activities are permanent and will be implemented continuously in the coming years.

Gender equality and equal pay for work of equal value

The Comarch Group, being aware that the persistent wage gap can have a long-term negative impact on equal opportunities, organisational culture and stakeholders' perception of the company, is taking measures to reduce this phenomenon and strengthen the principles of equal treatment.

Current activities:

- Annual monitoring of indicators and reporting of progress under ESG.

Activities planned in the coming years:

- organising diversity and anti-bias training for staff and management.

The aim of the Comarch Group's planned activities is to systemically reduce the gender pay gap and strengthen the principles of equal treatment throughout the organisation. The scope of activities covers all units of the Comarch Group and concerns employees at all organisational levels. The implementation of the activities is planned for the coming years and will be continuous, with an annual evaluation of the effects and the possibility of updating the goals on the basis of the monitoring results.

In 2024, the Group's activities in the aforementioned area did not require significant financial resources and among Comarch Group employees. No studies were conducted on the impact of these measures on their working conditions. Nor were measures taken to mitigate the negative effects on their own workforce resulting from the transition to a greener, climate-neutral economy.

8.6. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S1-5

The Comarch Group has not set measurable targets for its own staff resources in terms of ESRS. The Group monitors the effectiveness of the activities carried out and policies adopted as part of the Group's ESG Strategy.

The strategic directions concerning Comarch Group employees are defined in the document *"ESG Strategy Assumptions and Objectives"* and are in line with the adopted Code of Ethics, the Diversity Policy and also the HR Policy.

The strategic orientations apply to all Comarch Group employees, regardless of location, form of employment or position held. They concern areas such as working conditions, professional development, equality and diversity, health, social relations and anti-discrimination and anti-bullying.

The Group's main strategic direction in the social area up to 2027 is to create an attractive, safe and equal working environment that supports the professional and personal development of employees and strengthens the company's positive impact on the social environment.

In the area of social responsibility, Comarch has set the following strategic directions:

- **Continuously improving working conditions and increasing opportunities for employees' professional development**, including through access to training, development programmes and healthcare,
- **Promoting diversity and equality** by, inter alia, supporting the professional development of women and aiming to achieve a share of women in managerial positions that is commensurate with their share of the total workforce,
- **Preventing racial discrimination in the workplace**, defined as any exclusion, restriction or preference on the basis of race, colour, ancestry or national or ethnic origin that is intended to impair an employee's ability to exercise his or her rights to an equal position in the workplace,
- **Effective implementation of an anti-bullying policy**, including both preventive measures and a transparent mechanism for reporting and responding to irregularities.

Progress against the above strategic directions will be monitored through measurable indicators such as staff turnover, the proportion of women in management positions, the number of training courses, notifications under the anti-bullying policy, and the level of involvement in community and charitable activities.

Progress against the strategic directions is monitored periodically by the Human Resources, HR and ESG Departments and the results are presented as part of the annual Sustainability Report. The objectives may be updated in response to changing organisational and regulatory contexts and the results of impact analyses and stakeholder dialogues. In addition, as the Comarch Group joins the United Nations Global Compact, the targets may be adjusted to better reflect the UNGC principles and to support the implementation of the 2030 Agenda.

8.7. Characteristics of the undertaking's employees

Number of employees

S1-6

As of 31 December 2024, the Comarch Group had 3,362 employees in Kraków, 2,556 in other cities in Poland and 665 outside Poland.

All headcount figures presented in Disclosure S1-6 are sourced from internal HR systems and reported as headcount as at 31 December 2024, unless otherwise indicated. The measurement of the metrics presented below has not been validated by an external body other than the assurance provider.

In the course of its activities, the Comarch Group adapts its staffing levels to the level of its sales revenues.

The number of employees (headcount) by gender for the Comarch Group is shown below.

Comarch Group	Number of employees	
Gender	2024	2023
Male	3 546	3 495
Female	1 852	1 842
Other	-	-
Not reported	-	-
Total employees	5 398	5 337

Staff turnover

In 2024, turnover among Comarch Group employees did not differ from the previous one.

Staff turnover in 2024 was as follows:

	Total number of employees who left the unit during the reporting period	Rotation rate
Comarch Group	660	12,43%

The employment turnover rate was calculated as the ratio of the number of departures in the period under review to the average employment in the reporting period. Average employment was calculated as the arithmetic average of the number of employees employed at the beginning and end of the year - i.e. as at 01.01.2024 and 31.12.2024.

The number of departures takes into account all employees who terminated their cooperation with the Comarch Group in a given reporting period, regardless of the reason (including: voluntary resignations, contract terminations by mutual agreement, termination by the employer and contract expirations).

Contracts under which work is provided

The tables below show the number of people employed in the Comarch Group at the end of 2024 by the type of contract under which work is provided. The data comes from internal HR systems.

2024					
	FEMALE	MALE	OTHER	NOT DISCLOSED	TOTAL
Number of employees					
	1 852	3 546	-	-	5 398
Number of temporary employees					
	719	1 280	-	-	1 999
Number of permanent employees					
	1 133	2 266	-	-	3 399
Number of non-guaranteed hours employees					
	0	0	-	-	0
Number of full-time employees					
	1 715	3 484	-	-	5 199
Number of part-time employees					
	137	62	-	-	199

8.8. Characteristics of non-employee workers in the undertaking's own workforce

S1-7

The number of persons employed in the Comarch Group constituting, in-house human resources, at the end of each year from 2023 to 2024 is presented below by employment type. All headcount figures presented in disclosure S1-7 are derived from internal HR systems and reported as headcount at 31 December 2024, unless otherwise indicated. The measurement of the measure has not been validated by an external body other than the assurance provider.

Comarch Group				
Type of employment	Gender	2024	2023	
Contract of mandate	Women	168	172	
	Men	579	591	
	Others	-	-	
	Not disclosed	-	-	
	Total	747	763	
Cooperation agreement	Women	0	0	
	Men	19	18	
	Others	-	-	
	Not disclosed	-	-	
	Total	19	18	
Total		766	781	

8.9. Collective bargaining coverage and social dialogue

S1-8

There are no collective labour agreements or trade unions in the Polish companies of the Comarch Group. Comarch S.A. has appointed Employee Representatives who function on the basis of the Agreement concluded in Krakow on 24 May 2006 and the Act of 7 April 2006 on Informing and Consulting Employees (Journal of Laws 2006 No. 79, item 550, as amended). Employee representatives are elected from among all employees, employed under an employment contract. The election is carried out by the Company's employees every 2 years. The last election was held in March 2024.

Employees of the other Polish subsidiaries did not wish to appoint their representatives.

Collective Bargaining Coverage		Social dialogue	
Employees – EEA	Employees – Non-EEA	Workplace representation (EEA only)	
0-19 %	Poland	-	-
20-39 %	-	-	-
40-59 %	-	-	-
60-79 %	-	-	-
80-100 %	-	-	Poland

The percentage of employees represented by employee representatives was calculated as the ratio of the number of employees working at sites with employee representatives to the total number of employees working in the Group.

There are no trade unions in the Comarch Group's foreign companies in the DACH region, but works councils are in place. The election of a works council is not mandatory and the decision is taken by the employees. Participation in the election is limited by seniority.

Works councils in the DACH area:

- Comarch Solutions GmbH - Innsbruck, the company is also subject to a tariff agreement,
- Comarch AG - Central Works Council of the company, and there are also local works councils in most locations.

Works councils also exist 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 at Comarch SRL in Italy, but employees are subject to a national collective labour contract, which was created to regulate the relationship between employees and employers. Collective because it affects all employees in the sector subject to the contract and national because it applies to all companies that are located on Italian territory. It regulates the employment relationship, e.g. scheduling, qualifications and duties, remuneration, etc. Comarch SRL falls under the 'CCNL del commercio' (trade).

Similar sectoral agreements governing issues such as minimum wages and the obligation to provide additional benefits to employees apply to Comarch Sistemas LTDA in Brazil.

In Brazil, the workers' union takes the form of a structure operating outside the company. At the end of 2023, all employees belonged to this union.

There are no trade unions in the other foreign Comarch Group companies. Regular meetings with employees take place in many companies, but these are not formalised.

8.10. Diversity metrics

S1-9

The Comarch Group's staffing structure is based on four basic levels, which reflect the diversity of staff functions and responsibilities: managerial staff, administrative staff, production staff and other support positions.

In the Comarch Group, top management is defined as those in management positions up to the fourth level below the board of directors.

The employment structure of Comarch S.A. and the Comarch Group by main employee categories and by gender in 2024 is presented below. The data presented are from internal HR systems and are given as at 31 December 2024. The measurement of the metrics presented below has not been validated by an external body other than the assurance provider.

Comarch Group Categories of employees*	2024				Total	% of employees
	Female	Male	Others	Not disclosed		
administration	420	127	-	-	547	10%
top management	211	520	-	-	731	14%
production	1 048	2 700	-	-	3 748	69%
other	173	199	-	-	372	7%
Total	1 852	3 546	-	-	5 398	100%

Both at Comarch S.A. and in the entire Comarch Group, the dominant group in the employment structure are employees included in the 'production' category. This category includes, among others, programmers, system analysts, software engineers, implementation consultants, IT systems maintenance specialists and persons responsible for the development and maintenance of technical infrastructure, including data centres. The high proportion of this professional group reflects the technological nature of the Group's business, whose primary operational area is the design, development and implementation of advanced IT solutions - both in the product and service model.

The table below shows the distribution of the age structure of employees working for the Comarch Group.

Categories of employees	2024				Total
	Female	Male	Others	Not disclosed	
over 50 years	109	268	-	-	377
30-50 years	1 244	2 141	-	-	3 385
under 30 years of age	499	1 137	-	-	1 636
Total	1 852	3 546	-	-	5 398

8.11. Adequate wages

S1-10

In 2024, all contracted employees of Comarch S.A. and the Comarch Group were paid a salary equal to or above the minimum wage on a full-time basis.

8.12. Social protection

S1-11

All Comarch Group employees with an employment contract are covered by a compulsory social security system that provides a replacement income in the event of significant life risks such as illness, work accident, acquisition of disability, parental leave and retirement. This system operates on the basis of public social security programmes in Poland and in other countries where the Group operates, financed by employer and employee contributions.

With regard to unemployment, the Comarch Group benefits from deferred disclosure in the first year of the sustainability report under Appendix C of ESRS 1.

The range of benefits includes, among others, sickness benefits, rehabilitation benefits, maternity and paternity benefits, incapacity benefits and pensions. These benefits are available to all employees covered by social security, regardless of their position or salary level.

In accordance with applicable law, the companies 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 KS Cracovia SA have implemented Employee Capital Plans, which are managed by Allianz Specjalistyczny Fundusz Inwestycyjny Otwarty PPK managed by Towarzystwo Funduszy Inwestycyjnych Allianz Polska Spółka Akcyjna. Employees of foreign Comarch Group companies participate in pension schemes in accordance with local legal requirements.

In the Polish companies of the Comarch Group, additional medical packages are a benefit available to persons employed under an employment contract (irrespective of the duration of the contract and the number of full-time positions). In foreign companies of the Comarch Group, additional medical packages are provided where the level of generally available health care is low, taking into account local regulations and market practices in this area.

8.13. Training and skills development metrics

S1-13

The tables below show the average number of training hours per employee by gender of contracted employees in 2024. The data is taken from the internal training system. The measurement of the metrics presented below has not been validated by an external body other than the assurance provider.

Comarch Group	Average number of training hours per employee [h]
female	16,85
male	21,10
Total	19,64

In 2024, 2,966 interviews were completed out of 4,672 surveys generated, which translates into a response rate of 63%. At this stage, the Comarch Group does not have the technical capacity to obtain data by gender. In the future, system enhancements to enable such reporting are under consideration.

8.14. Health and safety metrics

S1-14

Health and safety data covers employees in the Comarch Group. Internal health and safety procedures are applied to this group, including risk assessment, training and supervision of working conditions. Due to the lack of a legal basis, occupational health and safety indicators do not include external collaborators or outsourced employees.

Accident data are actual data from the internal health and safety system. The measurement of the metrics presented below has not been validated by an external body other than the assurance provider.

Occupational health and safety Comarch Group	2024
Percentage of employees covered by health and safety management system	100%
Number of cases of reportable work-related ill health	0
Number of days lost due to work-related injuries and	86 days
Number of fatalities due to work-related accidents and work-related ill health and fatalities due to ill health and work-related injuries	0
Number of light accidents	4
Number of serious accidents	0

Number of fatal accidents	0
Number of mass accidents	0
Accident rate	0,37*

*The accident rate for employees was calculated according to ESRS standard S1-14: number of accidents divided by the number of hours worked by employees, multiplied by 1,000,000. The number of hours worked among employees was determined based on the assumption that 1 employee worked hours per day and the number of days worked in 2024 was 251 days.

8.15. Work-life balance metrics

S1-15

The table below shows data on the percentage of employees who have taken leave for family reasons in 2024.

Comarch Group	2024			
	Female	Male	Others	Not disclosed
Percentage of employees entitled to take leave for family reasons*	25,87%	11,14%	-	-
Percentage of eligible employees who took leave for family reasons	100%	100%	-	-

*Employees entitled to family leave are those covered by legislation, organisational policy, agreements, contracts or collective agreements that include entitlement to family leave, who have declared their entitlement to the unit and are included in the records.

The percentage of employees entitled to take family leave was calculated as the ratio of the number of employees meeting the formal conditions for taking the type of leave in question to the total number of employees with an employment contract within the Comarch Group.

The source data comes from the HR and payroll systems of Group companies and internal HR databases. The measurement of the presented metrics has not been validated by an external body other than the assurance provider.

8.16. Compensation metrics (pay gap and total compensation)

S1-16

Pursuant to the Remuneration Regulations, an employee is entitled to a basic salary for performing work for the employer. The amount of the remuneration is determined by the employer through negotiations with the employee, taking into account the remuneration levels of employees in similar jobs with comparable qualifications and work efficiency. The employer takes into account the employee's appraisal, which provides regular feedback on the goals achieved. The employer periodically reviews salary levels for specific positions comparing these levels to the labour market.

The Remuneration Regulations guarantee equality and adequacy of remuneration for work of equal value for both women and men. Gender does not determine the level of remuneration, but the objective criteria for assessing the work and the tasks and responsibilities of the position.

The table below shows the ratio of the average female salary to the average male salary in 2024.

Comarch Group	
Categories of employees	Gender Pay Gap (%)
administration	7,32
managerial	26,55
production	19,27
other	24,34

Total	19,35
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The Comarch Group's gross gender pay gap ratio was calculated in accordance with the methodology set out in ESRS Standard S1-16, as the ratio of the difference between the average gross hourly rate of male and female employees to the average gross hourly rate of male employees.

The gross gender pay gap ratio in the Comarch Group was calculated as a weighted average of the ratio for the Polish companies and the representative subsidiaries with the highest employment (taking into account a total of 43% of employment in foreign companies); employment levels in Polish companies and individual foreign companies were used as weights. This approach is due to the fact that it is not possible to take into account the direct level of remuneration in different countries due to the significant diversity of factors affecting remuneration - such as non-uniform currencies, different levels of remuneration in different locations around the world.

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

The CEO Pay Ratio for the Comarch Group is shown below.

Comarch Group	
CEO Pay Ratio	51,2

The CEO Pay Ratio was calculated as the ratio of the annual total gross remuneration of the best-paid person in the entity to the median annual total gross remuneration of all employees under employment contract (excluding that person). The indicator in the Comarch Group was calculated as a weighted average of the indicator for the Polish companies and the representative subsidiaries with the highest employment (taking into account a total of 43% of employment in foreign companies); the level of employment in Polish companies and individual foreign companies was used as weights. This approach is due to the fact that it is not possible to take into account the direct level of remuneration in different countries due to the significant diversity of factors affecting remuneration - such as non-uniform currencies, different levels of remuneration in different locations around the world.

The above source data is sourced from the HR and payroll systems of Group companies and internal HR databases. The measurement of the metrics presented has not been validated by an external body other than the assurance provider.

8.17. Incidents, complaints and severe human rights impacts

S1-17

According to the register kept, there were two reports of ethical violations in 2024, which resulted in investigations. The investigations did not find that any of the reported incidents qualified as a case of discrimination or as a serious violation of human rights.

Incidents and complaints	2024
Total number of confirmed cases of discrimination, including harassment in the workplace	0
Total amount of fines, penalties and damages for incidents and complaints	0
Number of serious incidents concerning respect for human rights related to the entity's staff resources, including those reported to the OECD Guidelines National Contact Points	0

Total amount of fines, penalties and compensation for damages resulting from serious incidents and complaints regarding respect for human rights	0
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The data is taken from the breach register maintained by the Compliance and Internal Audit Department. The measurement of the metrics presented has not been validated by an external body other than the assurance provider.

9. Affected communities

9.1. Material impacts, risks and opportunities and their interrelationship with the strategy and the business model

SBM-3

The Comarch Group has a significant positive impact on local communities through its own operations.

As part of its sports activities, a key area of the Group's social commitment is its subsidiary KS Cracovia S.A. - the oldest sports club in Kraków, participating in professional football and ice hockey leagues. Through KS Cracovia S.A. a number of initiatives are carried out aimed at local communities, including children and young people - such as tournaments, educational campaigns, integration events and charitable activities. These activities strengthen access to sporting activities and promote a healthy lifestyle.

The scope covers local communities living in particular in areas where Comarch Group offices and sports facilities are located, including communities living in the immediate vicinity of sports infrastructure in Krakow and other cities where the Group operates. The impact also covers residents of these cities who benefit from events, sport activities and social programmes implemented by KS Cracovia S.A. and other Comarch Group companies.

The second pillar of the Group's social activity is the popularisation of knowledge of the latest IT technologies. Every year, Comarch organises three-month summer internships for several hundred IT students, enabling them to gain practical experience in working with modern IT solutions by working in teams of several people under the supervision of experienced specialists, performing tasks related to modern technologies, applications and databases. After the end of the summer programme, more than 80% of the interns were employed by Comarch, on terms enabling them to adjust their work to classes at the university.

The Comarch Group also supports the development of Polish science by participating in and co-financing scientific conferences.

The third area of the Comarch Group's social commitment is to support local communities by sponsoring cultural festivals, concerts and events of social importance.

The Comarch Group supports diverse groups of beneficiaries through charity, sponsorship and corporate social responsibility (CSR) activities, including environmental organisations, educational institutions, cancer foundations, charitable institutions, sports clubs and the cultural community.

Actions that have a significant positive impact are described within chapter S3-4.

9.2. Policies related to affected communities

S3-1

The Comarch Group has a Code of Ethics, which refers to the Group's significant positive impact, i.e. social involvement, including social and charitable activities. According to the Code, one of the elements of "the Comarch Group's social activity is supporting initiatives for the benefit of local communities, in particular through: sponsoring cultural festivals, concerts or events of significant social importance". Information on the Code, including information on the description, general objectives, scope and the highest level responsible for its implementation, is described within chapter G1-1.

The Comarch Group has not adopted a separate policy on respect for human rights. Issues related to respect for human rights are included in the Code of Ethics, of which the policy on affected communities is an integral part (chapters 1,2 and 10 of the Code of Ethics). A description of the document's compliance with generally recognised international standards, including the UN Guiding Principles on Business and Human Rights, is provided in chapter S1-1.

The Comarch Group does not have a policy regarding the prevention and mitigation of impacts on indigenous peoples. According to the results of the double materiality assessment carried out, the Group's own activities have a significant positive impact on local communities, but this does not include communities classified as indigenous peoples.

There were no instances of non-compliance with the UN Guiding Principles on Business and Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises for Affected Communities within its own operations and value chain.

9.3. Processes for engaging with affected communities about impacts

S3-2

Cooperation with the local community, on which the Comarch Group has a significant positive impact, is carried out through activities supported primarily by the Employer Branding team, which maintains contact with beneficiaries by, among other things, analysing, on an ongoing basis, requests and applications for support, which can come both from an internal initiative - submitted by employees or Group units - and an external one - directed by institutions, organisations or individuals.

The frequency of activities is adapted to the specifics of each initiative and the expectations of the beneficiaries.

The opinions of the local communities are obtained as part of the analyses of the applications and the communication carried out. Based on the collected information, the Employer Branding team assesses the legitimacy of the support and prepares recommendations for the Board of Directors, which makes the final decision on the support to be provided and its form.

In cases where cooperation proposals go directly to the Board of Directors, the analysis of legitimacy and the decision to support is taken directly at Board level, bypassing the assessment stage by the Employer Branding team.

Collaboration takes place both through communication with the institutions and non-profit organisations to which donations are made, and directly with the beneficiaries, their representatives or carers - depending on the type of need and social situation.

Employer Branding activities are coordinated in close cooperation with the Group's Management Board, which oversees their compliance with the organisation's social policy and adopted values. The Employer Branding team is also responsible for monitoring the effects of the support provided.

The Comarch Group evaluates the effectiveness of its cooperation with beneficiaries on the basis of feedback on the support received and its impact on the activities of the supported entities. The support provided is of both a material and financial nature and is each time analysed in terms of adequacy and purposefulness. The evaluation takes into account both the effectiveness of the use of the funds provided and the compatibility of the beneficiaries' activities with the Group's social objectives.

9.4. Processes to remediate negative impacts and channels for affected communities to raise concerns

S3-3

The Comarch Group does not have dedicated mechanisms in place to enable local communities to directly raise comments, concerns or needs. However, those who are interested have the possibility to contact the company through the publicly available contact details provided on the Group's website posted at: <https://www.comarch.pl/kontakt>.

9.5. Taking action on material impacts, and approaches to mitigating material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions and approaches

S3-4

Key activities undertaken during the reporting year in relation to the Comarch Group's significant positive impact (community involvement, including social and charitable activities):

Popularisation of science and education

- Active cooperation with schools and universities:

AGH University of Science and Technology in Krakow

- partnership as part of the 'Financial Analytics and Industrial Process Control' course.

Wrocław University of Science and Technology

- Sponsorship of the Team Projects conference,
- Substantive participation of Comarch specialists and supervision of projects carried out by students (duration several months) as part of the Team Project Conference, e.g. the project for a computer-aided electronic targeting system (CTS), projects on the eye-tracking system and usability analysis of self-service applications, and the Artificial Scrum Master.

Łódź University of Technology

- participation in the 'Young in Łódź' internship and apprenticeship programme of Łódź universities,
- as part of the ICT Cluster Łódź, which is co-founded by the City Council and Łódź universities:
 - participation of Comarch specialists in various Cluster events and consultations, e.g. on the topic of bridging the generation gap at universities, Smart City Łódź,
 - substantive contributions to newsletters aimed at students.

Lublin University of Technology

- Participation in the Lublin IT Day - discussions with students about their career opportunities, sponsorship of the event,
- Participation in the faculty councils of Lublin University of Technology - knowledge exchange with the business community,
- Sponsorship of the 60th anniversary celebrations of the Faculty of Electrical Engineering and Computer Science.

Maria Curie-Skłodowska University in Lublin (UMCS)

- providing a tool for didactic work with students. The [Comarch EZD](#) system in the cloud will help students of the Faculty of Economics at Maria Curie-Skłodowska University master modern methods of electronic documentation management.

Częstochowa University of Technology

- free e-training on Comarch ERP Optima for students and lecturers.

University College of Enterprise and Administration in Lublin

- Participation in the Sociology in Business faculty council - sharing knowledge about the direction of the professions, the competences of the future and the challenges of developing AI.
- Awarding Deutschlandstipendium scholarships to students in Dresden studying International Business and Information Technology.
- Participation of Comarch Group specialists in meetings with students, career days, as well as conducting dedicated courses, industry meetings, and collaboration with academic circles, including:
 - Sponsorship and substantive support (participation of a Comarch expert) of an event of the Strategic Analysis Research Circle of the Cracow University of Economics - "Strategic Meetings in the World of Business",
 - Organisation of a DevOps debate for IT and related students,
 - Open lecture for students of the Poznań University of Economics from the Department of Insurance "IT projects in the insurance industry. On the challenges of the analyst and project manager",
 - Conducting workshops on the use of two IT systems by Comarch specialists: Comarch ERP XL and Comarch BI Point for AGH postgraduate students.
- Organisation of a series of free webinars aimed at developing professional skills and providing an introduction to the world of IT. Topics included artificial intelligence, programming and soft skills development.

Supporting the fight against disease and promoting health

- Supporting Luxembourg's cancer foundations (Fondation Cancer and Fondatioun Kriibskrank Kanner) by participating in the 'Rock Against Cancer' charity concert.
- Support for the Rak'n'Roll Foundation and individuals and families affected by cancer in the "Valuable kilometres" competition, where kilometres run/walked translated into financial support.

Charity and outreach

- Supporting the Great Orchestra of Christmas Charity (WOŚP) by organising auctions of unique items.
- Donation of several hundred pieces of computer equipment to schools and foundations.

Sports sponsorship and involvement in local sports communities

- Sponsoring triathlete Michał Grabowski, the athlete trains on a daily basis in Switzerland, where two subsidiaries of the Comarch Group are based.
- Sponsorship of sports clubs: the top-class football club Royal Unions Saint-Gilloise (cooperation extended for the 2024/2025 season) and the youth teams of the ice hockey club EVZ Nachwuchs AG and EVZ Sport AG (Zug).
- Comarch and Infortes' partnership with premier league basketball team Śląsk Wrocław for the 2024/2025 season.
- Collaborating with Cracovia supporters' clubs and associations, organising joint actions and events to integrate the club with the local community in Kraków and Malopolska.
- Establishment within the Cracovia Academy of a team of Striped Butterflies for children with intellectual disabilities, aiming to integrate and equalise opportunities.

Support for culture

- Sponsorship of the jubilee concert "Stars with Sinfonietta" with Mari Samuelsen at ICE Krakow.
- Acting as a patron of cultural events, e.g. the Last Night of The Proms in Cracow concert at the Cracow Philharmonic.

Thanks to the support of the partners, tickets for the concerts were offered at affordable prices, enabling a wider audience to attend. The sponsorship of the 'Stars with Sinfonietta' concert also enabled the 'Musician-in-Residence' educational programme, which aims to support young artists in gaining professional experience.

Community involvement and social campaigns

- Organisation of thematic meetings relating to the history of Poland and Cracovia, reinforcing patriotic values.
- Collaborate with rehabilitation centres, offering stadium tours and attending matches for young people to promote their social integration.
- Organisation of activities and events around Christmas: New Year's Workout and the Striped Christmas Tree integrating the community.
- Support for Polish Day in Brussels, an event promoting Polish culture and integrating the Polish community and the international community in Belgium. Comarch participated as a sponsor of the event to mark the 20th anniversary of the company's presence in the Benelux region.

Promotion of an active lifestyle

- Participation of employees from various Comarch branches in running events in Poland and abroad, including events of a charitable nature, such as the children's run in France, the "Lucky 13" in Łódź or the Company Run in Wrocław, as well as in other running events throughout Poland, including the PKO Rzeszów Half Marathon, the Warsaw Independence Run, the Silesia Half Marathon, the Piotrowska Street Run, the Puszcza Festival, the Marceliński Spring Run or the Run with a Whistle for Health.
- Organising educational campaigns, such as #BeltVisit and #BeltVisit, in schools to promote physical activity and healthy lifestyles.
- The organisation of football and sports tournaments by Cracovia, such as the Ekstra Class Academy or Ekstra Talent, involving children and young people in sporting activities.

Expected results: Improved quality of life for local communities by increasing access to educational, sporting and cultural initiatives, building relationships based on dialogue and trust, and strengthening the Group's positive image as a responsible and active participant in local life.

Scope of activities: Activities undertaken as part of the Comarch Group's own operations that impact affected communities.

Time perspective: The activities carried out by the Group are continuous and are adapted to the current needs and situations of the individuals and institutions receiving support.

How to track and evaluate the effectiveness of the measures is described in section 9.3.

Resources for social and charitable engagement: human resources, financial resources.

In 2024, the Comarch Group made donations to social causes with a total value of PLN 110,000, with the largest benefactors being the students of Technische Universität Dresden and Hochschule für Technik und Wirtschaft

Dresden and the State Fire Brigade JRG7. In addition, as in the previous year, the Comarch Group responded to social needs on an ongoing basis by donating nearly 250 pieces of electronic equipment (computers, laptops and monitors) needed for teaching to schools and non-profit organisations.

The table below shows the total amount of donations to social causes made by the Comarch Group between 2023 and 2024.

in thousands of PLN		2024	2023
Comarch Group		110	127
<i>the largest sponsored partners</i>	<i>Hochschule für Technik und Wirtschaft - HTW Dresden, Technische Universität Dresden</i>	<i>Hochschule für Technik und Wirtschaft - HTW Dresden, Technische Universität Dresden</i>	

The table below shows the total amount spent on sponsorship by the Comarch Group between 2023 and 2024.

in thousands of PLN		2024	2023
Comarch Group		7 538	7 020
<i>the largest sponsored partners</i>	<i>KS Cracovia SA</i>	<i>KS Cracovia SA</i>	
	<i>Royale Union Saint-Gilloise Football Club</i>	<i>Royale Union Saint-Gilloise Football Club</i>	

Comarch Group employees are also involved in many charitable activities (such as volunteering, collections for people in need, charity runs).

No serious human rights issues or incidents related to affected communities were reported in 2024.

9.6. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S3-5

In 2024, the Comarch Group has not set measurable, results-oriented targets in relation to significant positive impact.

The Group monitors the effectiveness of its actions is described in section 9.3.

In the area of affected communities, Comarch has set the following strategic directions:

- Looking after important social interests through dialogue with local communities, supporting sport and promoting healthy lifestyles, taking initiatives in the field of culture and education, popularising science,
- Providing material assistance to those in need and supporting charitable causes.

The group plans to set measurable, result-oriented targets in 2025.

Corporate governance

10. Corporate culture and business practices

10.1. Corporate culture and business conduct policies and corporate culture

G1-1

Since its inception, Comarch has consistently built, developed, promoted and evaluated an organisational culture based on a value system within which Comarch strives to, among other things:

- continuous and systematic attention to the quality and competitiveness of the products and services offered,
- adapting products and services to customer expectations and requirements,
- develop mutually beneficial cooperation with suppliers in order to improve the quality of the products and services offered,
- a high degree of care for the confidentiality and security of the information and data processed,
- the continuous upgrading of employees' skills through an appropriate educational system and training focused on quality, information security, environmental protection, energy management and occupational health and safety,
- the development of quality, environmental, energy, health and safety and information security awareness among employees,
- ensure safe and hygienic working conditions to prevent occupational accidents, occupational diseases and near misses,
- involving workers' representatives in consultations on measures having a significant impact on working conditions,
- take proactive measures to reduce negative environmental impacts, improve energy efficiency and reduce the carbon footprint associated with the company's operations,
- compliance with applicable legal and other requirements that apply to the organisation,
- 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 organisational culture is based on values such as openness, commitment, innovation, quality and social responsibility. These values are included in the Comarch Group's Code of Ethics.

The main documents and procedures in force in the Comarch Group relating to the Comarch Group's significant positive impact in the area of Corporate Culture to ensure respect for human rights and ethics in the value chain are:

- Comarch Group Code of Ethics,
- Sustainability Policy for Suppliers,
- Anti-Corruption Policy,
- Comarch Group anti-corruption guidelines,
- Diversity policy,
- Procedures for analysing and evaluating suppliers and subcontractors (chapter G1-2),
- Risk Management Procedure,

- Procedure for reporting violations of ethical procedures and standards in the Comarch Group, as well as applicable ethics legislation.

Comarch and the legally obliged companies in the Comarch Group have a Whistleblowing Procedure in place:

- ✓ Internal whistleblowing procedure in accordance with the Law on the Protection of Whistleblowers of 14 June 2024,
- ✓ Procedure established on the basis of the Act of 29 July 2005 on public offerings and the conditions for introducing financial instruments to the organised trading system and on public companies, applicable only at Comarch S.A,
- ✓ Procedure established on the basis of the Anti-Money Laundering and Countering the Financing of Terrorism Act of 1 March 2018 applicable at Comarch Finance Connect Sp. z o.o. and at iComarch24 S.A.

Code of ethics

As part of the Code of Ethics, described in detail in section S1-1, Comarch, among other things, commits to:

- compliance with international human rights and international labour standards,
- compliance with the principles of fair competition, prevention of bribery, illegal payments and corruption.

The following risks were identified for the development of the assumptions contained in the Code of Ethics:

- Risks of violations of ethics, corporate responsibility, respect for human rights and environmental protection,
- the risk of discrimination in all its forms,
- risks relating to non-compliance with rules on fair competition, prevention of bribery, illegal payments and corruption,
- risks related to the occurrence of non-compliance with legal requirements, international human rights and labour standards, internal procedures as far as ethics are concerned.

Comarch S.A. has a **Compliance and Internal Audit Department**, in the form of a separate unit responsible for, among other things, ensuring compliance with the law, the area of internal control and internal audit. The main tasks of the unit are:

- supporting the organisation in minimising the risk of non-compliance with laws, internal regulations as well as ethical and moral standards,
- enable the identification of risks that may affect the achievement of the organisation's stated business objectives and manage these risks accordingly,
- assessing the effectiveness of the organisation's internal control and risk management system.

All the activities described above are aimed at minimising the identified risk areas, controlling them and exercising ongoing control.

The responsibilities of the Compliance and Internal Audit Department include:

- supporting employees in complying with the Code of Ethics,
- promoting the idea of a Code of Ethics within the company,
- updating the content of the Code of Ethics,
- responding with appropriate measures to employees' current concerns regarding the ethics of their business activities.

Sustainability Policy for Suppliers

The Sustainability Policy for Suppliers sets out the key principles that guide the Group in carrying out its cooperation with business partners. In addition, the document represents a commitment to a sustainable

procurement policy and sets out expectations for key suppliers, including but not limited to respect for human rights. The Policy defines the following principles of cooperation with suppliers: supporting and encouraging ethics, social responsibility and environmental protection; ensuring high quality of products and services, taking into account health and safety principles; building good partnerships based on the principles of cooperation, trust and honesty; operating with respect for the law; selecting appropriate suppliers able to ensure high quality and good labour standards, environmental protection, business ethics and care for local communities. As stated in the Policy, the Comarch Group requires that the supplier implements environmental management principles in accordance with ISO 14001 or a similar standard; implements occupational health and safety management principles in accordance with OHSAS 18001 or a similar standard; applies good business practices typical of the supplier's scope of activity; operates in compliance with the law; respects the right of employees to associate; refrains from employing children under the age of 16; does not use corporal punishment or other degrading or inhuman treatment; and does not use forced labour institutions. The policy applies to all Comarch Group suppliers. The highest level in the organisation that is responsible for the implementation of the Supplier Sustainability Policy is the Company's Board of Directors.

Anti-corruption policy

The Anti-Corruption Policy, implemented in the Comarch Group, is a set of applicable rules and standards of conduct aimed at preventing and responding to activities that may bear the hallmarks of corruption. The Anti-Corruption Policy sets out how to act in situations where there is a threat of corruption or behaviour with the hallmarks of corruption. It complements the provisions of national and international anti-corruption legislation and the obligation to comply with these provisions is incumbent on every employee, associate and representative of the Comarch Group.

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

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

In order to remedy violations of anti-corruption and bribery procedures and norms, every employee, co-worker and representative of the Comarch Group is obliged to familiarise themselves with the anti-corruption principles in force in the Comarch Group, as well as to undergo training on the Anti-Corruption Policy and the Guidelines for the Prevention of Corruption in the Comarch Group, presented as part of the Integrated Management System training, which is obligatory for all Comarch employees every five years. In addition, the Anti-Corruption Policy is available on the intranet and on the external website of Comarch SA.

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 to prevent the occurrence of corruption risks and to respond to any manifestation of corruption.

The following risks were identified as part of good practice in countering corruption for the purpose of developing the assumptions contained in the Anti-Corruption Policy:

- risks relating to non-compliance with rules on fair competition, prevention of bribery, illegal payments and corruption,
- risk of conflict of interest in the business,
- the risk of job loss, financial penalties and notification of law enforcement authorities,
- risks associated with the occurrence of illegal benefits to employees, business partners or other third parties (including government officials and political party representatives),
- the risk of non-compliance with legal requirements and internal procedures as regards anti-corruption rules.

There have been no final convictions against Comarch S.A. or Comarch Group companies in the areas of human rights, corruption, fair competition behaviour and taxation.

The highest level in the organisation that is responsible for the implementation of the Anti-Corruption Policy is the Company's Board of Directors.

Diversity policy

For details of the Diversity Policy, please refer to section S1-1.

Risk Management Procedure

The Risk Management Procedure applies to products under development and projects carried out by Comarch, for which more detailed procedures do not apply. The procedure states that risk management is a continuous process, based on a periodic risk assessment that helps identify threats, vulnerabilities, records of security measures applied and plans for dealing with risks (mitigation, transfer and/or acceptance). The flow chart of the risk management process is as follows: documentation preparation and review; risk assessment; risk treatment planning; risk treatment implementation; monitoring and reporting. The first four steps should be repeated at least once a year, and after significant organisational, architectural or technical changes in the area under review. The last step (monitoring and reporting) should take place continuously. The risk management procedure applies to the entire Comarch Group. The highest level in the organisation that is responsible for the implementation of the Risk Management Procedure is the Board of Directors.

Procedure for reporting breaches of ethical procedures and standards in the Comarch Group, as well as applicable ethics legislation

The procedure shall apply, in particular, to reports concerning breaches of procedures and ethical standards in force in the Comarch Group, including in particular provisions of the Comarch Group Code of Ethics, as well as applicable legal provisions in the area of ethics. The purpose of the procedure is to ensure transparency in the activities of Comarch Group companies and to provide for the possibility of reporting violations of internal ethical standards and ethical standards resulting from legal regulations. The procedure provides for the possibility to report violations electronically through the Whiblo system. Reports can be both anonymous and named. Reporting can be done by any member of staff - regardless of their employment basis. The procedure ensures to whistleblowers the protection of their personal data, in particular the confidentiality of information. The Compliance and Internal Audit Department is responsible for conducting investigations, recommending solutions and communicating with whistleblowers. The procedure is to be applied throughout the Group - irrespective of the geographical breadth of its operations, but taking into account any local legislation. The highest level in the organisation that is responsible for implementing the Diversity Policy is the Company's Board of Directors.

Infringement reporting procedures

Employees have the right to expect Compliance and Internal Audit staff to assist and support them with queries about the Whistleblowing Procedure at a dedicated email address: compliance@comarch.pl

Employees, collaborators and external parties have the possibility to anonymously report any ethics violations or non-compliance with regulations or Comarch Group compliance procedures through the Whiblo system. The Whiblo system is a whistleblowing channel that allows for anonymous reporting with the possibility of anonymous two-way communication with the person reporting the violation. In parallel, appropriate procedures have been implemented to regulate the rules for reporting and investigation. The Whiblo system ensures that business conduct incidents, including incidents of corruption and bribery, can be investigated promptly, independently and objectively. at this point it should be noted that the Comarch Group also has a Compliance Procedure in place, which provides for the independent and objective investigation of business conduct incidents, including incidents of corruption. The Compliance Procedure was adopted for application by a resolution of the Management Board of Comarch SA dated 30 April 2025.

It should be noted that even before the Whistleblower Protection Act came into force, in the event of any irregularities, including in the area of employment, employees had the possibility to report them to their superiors. In addition, reports of any ethical violations or non-compliance with regulations or procedures in force in the Comarch Group in the area of compliance could be reported by employees to compliance@comarch.pl or anonymously via internal mail. Already at that time, an additional channel for reporting violations in the form of the Whiblo system was implemented in the Comarch Group. At the same time, appropriate procedures were implemented to regulate the rules of reporting, investigation and protection of whistleblowers.

Protection of reporters and whistleblowers

The Comarch Group's whistleblowing procedures guarantee the protection of whistleblowers by ensuring that whistleblowing can be done anonymously, by prohibiting retaliation and by limiting access to information contained in whistleblowing reports to the minimum necessary. It is prohibited to disclose the identity of the person making the report without his or her express consent. Persons serving on committees reviewing reports shall sign appropriate declarations with regard to, inter alia, the duty of confidentiality. In addition, only persons with written authorisation from the Management Board have access to the data contained in infringement reports. All actions taken in the course of investigations shall respect the privacy of the reporting persons. Retaliation, as well as attempts or threats of such action against the whistleblower, is prohibited. Retaliation constitutes a serious breach of employee duties. Notwithstanding the above, a person taking retaliatory action is subject to liability as set out in the Whistleblower Protection Act.

Procedure for dealing with legal and ethical breaches

All reports are reviewed by an independent committee, the composition of which depends on the type of violation reported, and are classified as either accepted or rejected reports. The committee is composed of Comarch Group employees. If a report is acknowledged, appropriate action is taken to clarify and resolve it. According to the register kept, there were 3 reports of ethical violations in 2024, which resulted in an investigation. The results of the investigations are reported to the Board of Directors. In order to continuously improve the qualifications of the employees accepting notifications, the Comarch Group provides them with external training.

Prohibition of mobbing

As part of the ESG Strategy, there is, among other things, an objective to be achieved in terms of the effective implementation of an Anti-Bullying Policy defining bullying behaviour and providing for a whistleblowing procedure in this respect. The objective is to create an Anti-Discrimination and Anti-Harassment Policy for the Comarch Group, which will then be approved by the Management Board and adopted for implementation. The assumptions of the Policy will 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 the provisions of this Policy, local subsidiaries may modify the provisions of the Policy, subject to prior approval of the Comarch SA Compliance and Internal Audit Department. As adopted in 2024, the Comarch Group Anti-Discrimination and Anti-Bullying Policy will be implemented by the end of 2025 and will be in force indefinitely, assuming continuous and systematic updates. The Policy will constitute 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 objective was not consulted with stakeholders.

The Comarch Group Anti-Discrimination and Anti-Bullying Policy will be a public document and therefore anyone interested will have the opportunity to make comments and suggestions to improve its content.

The Comarch Group Anti-Discrimination and Anti-Bullying Policy was developed and adopted for application by a resolution of the Management Board of Comarch S.A. of 30 April 2025.

Communication and training on business conduct, corporate culture and ethics, including on human rights and anti-corruption policies

Strengthening the ethical organisational culture of the Comarch Group is done by means of information campaigns and trainings on ethics and compliance within the Group companies in order to continuously raise the awareness of employees about the basic values in force in the Comarch Group and the principles concerning, among others, ethics, anti-corruption policy, respect for human rights, prohibition of discrimination, equal treatment are distributed within the Comarch Group through information channels (mailing, Intranet). Periodic trainings in this area are organised internally, available and obligatory for all employees, and information about the rules in force in the Comarch Group is presented to newly hired employees as part of the First Step training.

The communication of information to the management and supervisory bodies, at Comarch S.A., in the area of ethics, compliance management, as well as risk factors in these areas takes place during the current meetings of the Head of the Compliance and Internal Audit Department with the Management Board, while to the Supervisory Board within the framework of the annual Reports on the functioning of the internal control system, risk management and compliance, as well as the internal audit function in the Comarch Group, together with an assessment of their effectiveness prepared by the Compliance and Internal Audit Department.

10.2. Management of relationships with suppliers

G1-2

The main sources of supply for Comarch S.A. and the Comarch Group are multinationals, i.e. producers of computer hardware and software and electronics related to the developed device production. Most of the orders are realised through purchases from local branches and local distribution. The Comarch Group's operations are not dependent on any one supplier. In 2024, as in the previous year, no contractor provided products or services with a value exceeding 10% of the Comarch Group's sales revenue.

Companies applying to become a Comarch Group supplier are given a questionnaire to complete, which includes questions about the scope of implemented and certified management systems, concerning health and safety at work, social responsibility, care for the environment, energy management and information protection. The answers given in the questionnaire are validated and the company is then qualified by the system into one of four supplier categories: I - selected for cooperation first, II - second, III - reserve, IV - risky. The highest, first category is given to those companies that declare to comply with the standards required by the Comarch Group.

In accordance with the supplier analysis procedure, the dispatch of questionnaires is additionally renewed on a cyclical basis every year also to the companies that completed the questionnaire in previous years in case the suppliers have noted changes in their organisation in the areas that are the subject of the survey. In 2023, 1,042 surveys (including cyclical surveys) were sent from this platform and completed by 22 suppliers. By 31 December 2024, 1,064 surveys (including cyclical surveys) had been sent from this platform and completed by 34 suppliers.

In the next stage of the analysis, after the execution of the order, the quality of cooperation is also assessed. The following factors are taken into account: flexibility in solving problems, flow of information during order processing, meeting the delivery/service deadline, compliance of the order with specifications, quality of the goods/service, compliance of the invoice with the agreements (price, payment terms). On the basis of an average assessment of cooperation from the last year, the supplier is assigned one of four categories: I - selected for cooperation in the first place, II - second place, III - reserve, IV - risky.

Comarch S.A. does not have a policy aimed at preventing late payment, but it does report annually on payment terms in commercial transactions and does not use abusive clauses.

10.3. Prevention and detection of corruption and bribery

G1-3

All rules related to anti-corruption are included in the Anti-Corruption Policy. The operating principles are described in G1-1. In accordance with the Code of Ethics, Comarch Group employees, both in internal and external relations, must not offer, give, promise, demand or accept financial or personal benefits that could be perceived as illegal, unethical or inappropriate or

whose purpose is to influence the terms of a transaction. It is forbidden to pay or offer bribes or illegal benefits to government officials, or representatives of political parties, in order to conclude or maintain a transaction. Comarch employees are required to avoid situations in which their personal interests or the interests of legal or natural persons with whom they are related or associated would conflict with the interests of the Comarch Group. Employees of the Comarch Group shall not derive any benefit or assist in deriving any advantage from opportunities that may arise as a result of the use of information or position within the company.

In the case of KS Cracovia, the obligation to carry out corruption risk training stems from the PZPN licensing guidelines. In this case, the training covers players and teams and Academy teams. The training in question is preceded by a central training as part of the project "Prevention of corruption and match-fixing in football clubs," organised by the Ministry of Sport and Tourism, which is attended by the person subsequently conducting the training for KS Cracovia.

In addition, every employee has the possibility to send questions, concerns and comments or reservations regarding, among other things, the Anti-Corruption Policy to the e-mail address: compliance@comarch.pl. On the other hand, violations in this regard, any employee, as well as, inter alia, suppliers, can report to the Compliance and Internal Audit department, anonymously or by name, through a channel dedicated to reporting violations: Whiblo. The update of the internal regulations in the field of corruption is approved by the Board of Directors, thereby familiarising itself with its contents.

Comarch SA does not perform stationary ethical audits of suppliers, however, as part of its Supplier Sustainability Policy, it supports and encourages suppliers to be ethical in their actions and to comply with the anti-corruption standards implemented in the Comarch Group.

Corruption risk is one of the risks, among others, of the Compliance area included in the Comarch SA Risk Map. After the analysis by the Compliance and Internal Audit Department of the risk in question, it was found that the most at-risk areas in terms of corruption and bribery are the Departments and persons related to purchasing and investments.

Indicators for anti-corruption training at Comarch S.A.	2024
Number of employees trained (persons)	1302*
Percentage of employees in functions at risk of corruption (in %)	87,91**
Number of Management Board and Supervisory Board members trained	3***

* The figure given is the number of people who received training in 2024 from among all Comarch S.A. employees.

**The figure given is the percentage of persons performing functions exposed to corruption with up-to-date training at Comarch S.A. on, inter alia, the Anti-Corruption Policy (of the indicated group of persons, 17.58% have been trained in 2024)

*** The figure given is the number of people with current training at Comarch S.A. on, inter alia, the Anti-Corruption Policy.

The Board of Directors is informed of reports of violations, actions taken and proposed solutions by the committees conducting the investigations.

Information in this regard is also contained in the Report to the Supervisory Board, which contains, among other things, a description of the functioning of the systems for internal control, risk management, compliance and the internal audit function, as well as a proposal of measures adopted for the following year.

Targets adopted for 2025:

- Creation of a Compliance Procedure.

The aim is to create an Internal Procedure for reporting compliance violations, which will then be approved by the Board of Directors and adopted for implementation. The assumptions of the Procedure will apply to all employees and collaborators of the Comarch Group. According to the assumptions adopted in 2024, the Internal Procedure for reporting compliance violations will be implemented by the end of 2025 and will be in force indefinitely, assuming continuous and systematic updating. The procedure will aim to ensure that all employees and collaborators of the Comarch Group are able to report violations in a safe manner, as well as to define the rules for doing so.

The internal procedure for reporting compliance violations will be available on the intranet, thus every employee and colleague will have the opportunity to submit their comments and suggestions to improve its content.

- An internal procedure for reporting compliance violations was developed and adopted for use by a resolution of the Comarch SA Management Board dated 30 April 2025.
- Creation of a Comarch Group Compliance Policy.

The aim is to create a Comarch Group Compliance Policy, which will then be approved by the Management Board and adopted for implementation. The Policy will 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 the Policy's provisions, local subsidiaries may modify the Policy's provisions subject to prior approval of the Comarch SA Compliance and Internal Audit Department. As adopted in 2024, the Comarch Group Compliance Policy will be implemented by the end of 2025 and will be in force indefinitely, subject to continuous and systematic updates. The Policy will constitute a set of principles, standards and commitments aimed at ensuring the compliance of Comarch Group Companies with applicable laws, ethical standards, quality standards and principles of sustainable development.

The Comarch Group Compliance Policy will be a public document, thus anyone interested will have the opportunity to make comments and suggestions to improve its content.

The Comarch Group Compliance Policy was developed and adopted for application by a resolution of the Management Board of Comarch SA dated 30 April 2025.

- Creation of a Comarch Group Anti-Discrimination and Anti-Bullying Policy (described under G1-1);
- Organising dedicated training only:
 - The Anti-Corruption Policy for persons at particular risk of corruption and bribery,
 - The Commission's Anti-Discrimination and Anti-Bullying Policy Committee.

The aim is to develop two independent training programmes on the Anti-Corruption Policy and the Anti-Discrimination and Anti-Mobbing Policy, which will then be implemented for execution by the Compliance and Internal Audit Department. The trainings will apply to all employees and collaborators of the Comarch Group - both in Poland and abroad. According to the assumptions adopted in 2024, they will be implemented by the end of 2025 and will be carried out indefinitely once a year, with the assumption that they will be continuously and systematically updated. The trainings will constitute a set of principles, standards and commitments aimed at ensuring that the activities of Comarch Group Companies comply with the applicable laws and ethical principles in the field of anti-corruption, workplace discrimination and mobbing.

The training courses will be available on the intranet; thus, every employee and colleague will have the opportunity to make comments and suggestions to improve their content.

Stakeholders were not consulted on the objectives.

10.4. Confirmed incidents of corruption or bribery

G1-4

In 2024, there were no corruption and bribery violations in the Comarch Group, including:

Incidents of corruption	2024
Number of convictions for violations of anti-bribery and anti-corruption laws	0
Number of fines for violation of anti-corruption and anti-bribery legislation (in PLN)	0,00
Number of confirmed cases of corruption or bribery	0
Number of confirmed cases of own employees being dismissed or punished for incidents involving corruption or bribery	0
Number of confirmed incidents related to contracts with business partners that were terminated or not renewed due to breaches related to corruption or bribery	0

A description of the actions taken to address breaches of anti-corruption and anti-bribery procedures and standards is provided under Chapters G1-1 and G1-3.

10.5. Payment practices

G1-6

Comarch applies payment terms that are in line with applicable regulations.

Standard payment terms for suppliers are:

- 14-21 days for small and medium-sized enterprises (SMEs),
- 30-60 days for large companies,
- Individual terms and conditions may be negotiated where justified.

The above deadlines result from contracts concluded and payment documents issued. At the moment, the Comarch Group does not distinguish supplier categories in its records, including by size. In the future, it is planned to introduce the identification of entities belonging to the SME group.

With regard to small and medium-sized enterprises (SMEs), the Comarch Group is particularly diligent in ensuring that payments are made on time. In the case of SME suppliers:

- shorter payment terms are preferred (indicated above: up to 14-21 days),
- the possibility of agreeing payment terms in advance, taking into account their financial situation, is offered,
- it is the practice of the Comarch Group to avoid unilaterally imposing unfavourable commercial conditions.

The Group aims to pay its obligations to counterparties and suppliers on time. Cash flows are regularly monitored to minimise late payments. The percentage of payments in line with standard payment terms in 2024 was: 78,70%.

The average time it takes for the Comarch Group to pay an invoice from the start of the calculation of the contractual or statutory payment deadline is 3 days.

There were no legal proceedings pending in 2024 in relation to late payments.

11. Personal data and cyber security (specific disclosure)

11.1. Material impacts, risks and opportunities in the area of personal data and cyber security

G2-SBM3

As a provider of end-to-end IT solutions for many industries - including the financial, medical, public administration and telecommunications sectors - the Comarch Group processes significant amounts of data, including sensitive personal data. Accordingly, cyber security and data protection are areas of key importance to the Group's operations, both from the perspective of impact on stakeholders and potential financial and reputational risks.

Within the Comarch Group structure, cyber security and personal data protection have been identified as some of the most important areas with a direct impact on operational activities and development strategy. Comarch Group companies, as providers of IT solutions, act as both data controllers and processors. This means that the Group processes customer data, employee data, as well as a range of personal data entrusted by customers, which entails a high level of responsibility. Ensuring cyber security and the protection of personal data in accordance with applicable regulations and standards has a significant impact:

- ✓ company reputation,
- ✓ customer confidence,
- ✓ increases an organisation's credibility in the marketplace and builds a positive image,
- ✓ ensures compliance with regulations, thus reducing the risk of heavy financial penalties
- ✓ security, including employees, customers and end users , which is so important in the era of digitisation and the growing number of threats. By implementing high data protection standards, Comarch is seen as a more reliable and stable business partner.

Disclosing data in a way that does not take into account privacy principles can lead to violations of data subjects' rights. Cyber threats and potential data leaks can lead to loss of customer trust and abandonment of services, loss of image for the company, which directly affects the organisational stability of the company.

The widespread digitalisation, the development of modern technologies and the increase in their importance create a number of opportunities for dynamic growth, while at the same time raising the level of risk associated with the inappropriate use of these technologies. The new vectors of cyber-attacks, which may have serious security consequences, as well as financial, legal or image implications, make cyber security at the Comarch Group an important element in relation to the company's activities and the dynamically changing environment in which it operates.

In the face of these threats, information and the systems for processing it represent a critical and core value for the company, both for stable operational functioning and from a reputational point of view. The Group places great emphasis on the protection of data (especially personal data) and assets of its own and its customers , as well as end users .

11.2. Policies related to the personal data area and cyber security

G2-1

Personal data

With regard to the area of personal data protection, the Comarch Group does not have a policy in place, but with the entry into force of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free flow of such data and the repeal of Directive 95/46/EC (RODO), procedures governing the principles of

personal data processing have been implemented in the Comarch Group. A general data protection procedure has been adopted, together with procedures governing specific data protection issues in the Comarch Group.

The procedures describe in particular: general principles of personal data processing, performance of duties of the controller and processor, data protection impact assessment, security requirements for data processing systems, principles for granting authorisations to process personal data, principles for dealing with requests from data subjects, principles for remote working, or principles for dealing with breaches (including personal data breaches).

The Procedures are created and updated by the Data Protection Officer Department and implemented in the Comarch Group after prior approval by the Comarch S.A. Management Board. The procedures are binding on all employees and collaborators of the Group.

Cyber security

In addition to personal data procedures, the Comarch Group also has policies and procedures governing information security. These include in particular:

- Based on the international security standards ISO 27001, the Comarch Group Security Policy and the accompanying procedures cover, among other things: organisational issues, employee awareness, physical protection of assets, technical IT security, business continuity and response to information security incidents. The most important objective of the Security Policy is to ensure the confidentiality, integrity and availability of Comarch Group and customer data.

The principles of the Security Policy apply in all companies of the Comarch Group, taking into account local law considerations, while they have been formally implemented in Comarch S.A. and selected subsidiaries of the Comarch Group, the management boards of which have accepted declarations of application of this Policy.

The Policy applies to all employees working in the covered companies. Subcontractors and suppliers providing IT and information security services are not directly covered by the Policy; however, contractors are vetted to ensure compliance with information security requirements in accordance with the scope of the cooperation prior to establishing cooperation.

The implementation of the Policy is monitored by the CISO Division, which conducts periodic compliance reviews, security testing, incident and risk assessment. In addition, an annual review of the Integrated Management System is carried out, which includes a review of the Information Security Management System, the results of which are presented to top management.

The implementation, updating and supervision of the Policy is the responsibility of the Management Board of Comarch S.A., which approves its wording and supervises its application at the level of the entire Comarch Group. The operational implementation and ongoing enforcement of the Policy is the responsibility of the Chief Information Security Office (CISO), who reports company-wide matters directly to the President of the Management Board and sector-specific matters to the Director of the respective Sector.

- The Information Security Incident Management Procedure is part of the Security Policy and applies to all Group companies that have adopted the application of the Security Policy. The procedure defines the process of managing incidents in the Comarch Group, including those in the area of personal data protection breaches and cyber-attacks in the broadest sense. The CISO Division is responsible for implementing, updating and supervising the procedure.
- The Risk Management Procedure, which sets out the methodology for assessing and dealing with information security risks, and the Business Continuity Management Policy, which sets out the principles for ensuring business continuity of the services provided and for crisis management in the event of threats.

The Risk Management Procedure and Business Continuity Policy are in force in Comarch Group companies and apply to all business areas where operational, technological and information risks are identified. The BCP Board is responsible for implementing, updating and supervising the Business Continuity Policy.

The Comarch Group monitors the effectiveness of its policies and the technical and organisational measures in place through cyclical risk analyses.

11.3. Addressing material impacts and applying approaches to manage significant risks and exploit material opportunities related to the area of personal data and cyber security

G2-2

The following is a list of key data protection and cyber security activities that were undertaken during the reporting period and that are planned for future implementation. Due to the specific nature and critical importance of the area of personal data protection and information security, the activities initiated are continuous and ongoing.

Activities undertaken as part of the Comarch Group's own operations:

Functioning of the IMS. The Comarch Group has an Integrated Management System (IMS), which is certified at Comarch S.A., while the implemented procedures apply to all Comarch Group Companies. As part of this system, a comprehensive information protection system is implemented - the Information Security Management System (ISMS) based on ISO 27001 standards. The ISMS covers all internal processes supporting the company's operations and business processes and includes all company assets. As part of this system, security audits of the Comarch Group's internal systems are conducted by a dedicated internal department dealing with security issues. In addition, the organisation is audited by certification bodies. ISO certification. The Group uses international security standards, such as ISO 27001, which is certified at Comarch S.A., Comarch S.A.S. and Comarch AG - while the implemented rules apply to all Group companies. Guidelines resulting from the NIS2 directive are also applied to guarantee the level of protection of processed data in line with the current regulations on personal data protection and cyber security.

Within the area of data protection, the Group in accordance with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (RODO)

- in companies for which such an obligation has arisen, Personal Data Officers have been appointed who are responsible for ensuring compliance with the provisions of the RODO, issuing opinions, recommendations in the area of personal data, cooperation with the supervisory authority,
- The Group applies adequate technical measures and organisations to the identified risks. They are regularly reviewed and updated to adapt to changing risks, technological advances and applicable legislation,
- maintains registers such as the register of processing operations, the register of categories of processing, the register of infringements or the register of requests as part of the recording of data processing and accountability,
- has implemented an internal process for authorising employees to process personal data. Authorisations are given and received in a dedicated system in accordance with our internal procedures,
- as part of its risk management, conducts risk analyses and Data Protection Impact Assessments (DPIAs),

- In fulfilment of the information obligation within the framework of transparency in the processing of personal data and fair information of data subjects, the Group has prepared a dedicated information clause covering the main and most frequent purposes for which personal data are processed and has posted it on the website. In addition, separate clauses are created for each specific process. The clauses are tailored to the purpose, legal basis and form of contact (online/offline) and are communicated in a manner consistent with the requirements of the RODO,
- as part of the education and awareness-building of our employees, personal data training is provided and regular articles and educational materials are prepared on the topics of personal data processing, information security and obligations under the RODO regulations.

The Comarch Group is taking measures and investing in technical and organisational resources to ensure effective management of the cyber security area, including mitigating risks and strengthening the positive impact in this area. To this end, it has implemented a set of measures in line with recognised industry standards, e.g. PN-EN ISO/IEC 27001:2017 - 06 Information Security Management System, which include:

- defining requirements and developing recommendations and good practices in the area of security, as elements supporting the implementation of the Security Policy and related operating procedures,
- Establishment of organisational structures in the area of cyber security - there are expert teams within the Group that deal with information protection, define and implement standards and monitor the security status of Comarch Group assets,
- training and education of employees through regular user awareness programmes (Security Awareness) in the area of information security, identification and resistance to phishing attacks,
- organisational and technical solutions implemented to monitor and protect the IT infrastructure,
- internal audits - including comprehensive Integrated Management System audits and security audits and penetration testing of systems and applications to identify potential vulnerabilities and threats,
- external audits carried out by independent bodies to verify compliance with the requirements of ISO/IEC 27001, confirming the effectiveness of the implemented Information Security Management System,
- conducting maturity assessments of all products classified for such assessment and preparing plans to improve SSDLC maturity,
- overseeing the implementation by business units of SSDLC objectives to monitor and adjust the security level of software produced by Comarch Groups,
- implementation of security requirements in the systems, depending on the level of criticality and risk,
- a periodic assessment of the achievement of security objectives conducted at Board level to assess whether cyber security objectives have been met and where further investment and improvement is needed.

These activities and resources are put in place to ensure that the individual safety objectives of the organisation are met.

Conclusions on the performance of the security management system are reported to the Management Board of Comarch S.A., and on the basis of these conclusions, necessary improvement and corrective actions are taken to further improve the security level.

The progress of the above-mentioned activities is verified through audit reports (once a year), analysis of the incident register, updates to procedures and policies and the indicators/measures described in the subsection below.

Actions taken in relation to the supply chain:

- In terms of compliance with the provisions of the RODO, in relations with subcontractors and suppliers, a detailed vetting of contractors to ensure compliance with personal data protection requirements, including technical and organisational security measures, is carried out prior to the establishment of cooperation. This is followed by regular reviews and data processing entrustment agreements setting out the principles for entrusting data processing,
- In terms of ensuring information security in relations with subcontractors and suppliers, a vetting of contractors to ensure compliance with information security requirements in accordance with the scope of the cooperation is carried out before the cooperation is established.

The progress of the above-mentioned activities is verified through a supplier review.

Expected results: ensuring the protection of personal data, maintaining full compliance with RODO and other industry regulations on personal data protection, increasing employees' knowledge and competence on RODO and cyber security through periodic training and awareness campaigns and increasing the level of security, building the trust of customers, partners and employees in the organisation through a responsible and transparent approach to personal data.

11.4. Measures and targets for managing material negative impacts, enhancing positive impacts and managing material risks and opportunities

G2-3

The area of data protection has been recognised as important in the organisation as a result of a double materiality assessment, and the Comarch Group has therefore set targets in this area.

Goal: From 2025 onwards, increase the awareness of all own employee resources by carrying out awareness-raising actions related to RODO topics on a regular basis, with a frequency of more than quarterly. Through this objective, the Comarch Group wants to achieve an increase in employee knowledge and competence which also has an impact on minimising the risk of breaches.

In order to monitor the progress and effectiveness of the activities, the Comarch Group adopted as a yardstick: the number of awareness campaigns carried out. In 2024, in addition to the mandatory training on personal data, the Comarch Group conducted awareness campaigns for employees at least once a quarter. The total number of campaigns carried out in 2024 was 4. Data on campaigns carried out comes from records kept by the Personal Data Inspector.

Goal: to minimise the risk of breaches by implementing protection mechanisms and consequently reduce the occurrence of breaches. - By the end of 2025, it is planned to reduce the occurrence of breaches compared to 2024.

In order to effectively monitor progress in minimising the risk of breaches, the Comarch Group uses as a yardstick: the number of recorded data protection breaches, which are recorded in the Data Protection Breach Register.

In 2024, 14 personal data protection breaches were recorded in the Comarch Group, which, after assessment, did not require notification to the supervisory authority due to the low probability that they would result in a risk of violation of the rights or freedoms of individuals. The number of violations recorded in the internal register over the last two years oscillates at around a dozen cases per year and remains at a similar, constant level.

Stakeholders were not involved in setting the above targets.

The second measure is the number of proceedings and administrative penalties imposed on the organisation. Both in 2024 and in previous years, there were no administrative proceedings conducted against Comarch Group companies (e.g. UODO) as well as no penalties imposed for non-compliance with the law and regulations in matters related to the protection of personal data (divided into final and non-final). Actual data from internal records.

In the area of security, the Comarch Group defines cyclical objectives for the continuous planning and implementation of solutions for processes, projects, products. These objectives are based on individual risk assessment, current threats, customer needs and global standards. The Group has not set Group-wide measurable, results-oriented targets, except in the area of personal data protection.

Krakow, 2 June 2025

SIGNATURES OF THE MANAGEMENT BOARD MEMBERS

Name	Position/Function	Signature
Jaroslav Mikos	President of the Management Board	
Marcin Kaleta	Vice-President of the Management Board	
Michał Mędrala	Vice-President of the Management Board	
Zbigniew Rymarczyk	Vice-President of the Management Board	
Konrad Tarański	Vice-President of the Management Board	

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