COMARCH

Sustainable Report of Comarch Group for 2025

Kraków, 11 August 2026

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

Dear Stakeholders,

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

Irrespective of formal requirements, the Comarch Group has for many years been applying best practice in the field of sustainability reporting and corporate social responsibility. This stems both from an internal need for communication and from the expectations of stakeholders.

Given the nature of the company's business, the key sustainability issues for the Comarch Group are social matters relating to employment and human rights, as well as issues concerning diversity management, including within the management and supervisory bodies. In the opinion of the Management Board of Comarch S.A., compliance with relevant standards and reporting on them is essential for the proper management of the company's human resources and is therefore a key element in ensuring its long-term development and maintaining its competitive advantage.

Guided by the principles of responsible business conduct, Comarch is a signatory to the United Nations Global Compact – the UN's largest global initiative promoting sustainable business, bringing together over 24,000 companies and organisations committed to implementing the UNGC's Ten Principles in the areas of the environment, human rights, labour standards and corporate governance.

In response to growing climate ambitions, we are updating our existing commitments and preparing to set emission reduction targets in line with the internationally recognised Science Based Targets initiative (SBTi). To lay a solid foundation for these, in 2025 we refined our carbon footprint calculation methodology, enabling us to estimate emissions across all Scope 3 categories.

In 2025, the Comarch Group continued its efforts to improve management, promote diversity, encourage a healthy lifestyle, protect the environment, develop renewable energy sources, and support culture, sport, local initiatives and charitable activities.

The past year was also a period of significant organisational changes, particularly in the context of CVC Capital Partners' equity investment and the implementation of Comarch's AI transformation strategy. Employees and associates play a key role in this process, which is why in 2025, nearly 1,400 engineers within the Comarch Group were trained in artificial intelligence, developing skills related to, amongst other things, prompt engineering and working with AI agents. At the same time, the AI Academy is being developed and the organisational culture is being strengthened, based on the synergy between technological expertise, commitment and responsibility.

The Management Board of Comarch S.A. emphasises that this Sustainability Report contains non-financial information relating to the Comarch Group. The report has been prepared on a voluntary basis in accordance with the European Sustainability Reporting Standards (ESRS) adopted by the European Union, as introduced by Commission Delegated Regulation (EU) 2023/2772. Although there is no formal obligation to do so, the Comarch Group has decided to apply these standards in order to ensure full transparency, comparability of data and to prepare for future regulatory obligations. Data on key performance indicators has also been disclosed in accordance with Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (the EU Taxonomy).

This report covers data for 2025 and comparative data for 2024. This report is subject to certification as well as external verification by professional auditors.

Management Board of Comarch S.A.

General Information

1. General disclosures

1.1. General basis for preparation of the sustainability statement

BP-1

The Comarch Group's sustainability report has been prepared voluntarily in accordance with the European Sustainability Reporting Standards (ESRS) adopted by the European Union, in force as at the date of preparation of the Report, as well as the European regulations concerning the European Taxonomy.

The scope of this Sustainability Report has been prepared on a consolidated basis and is consistent with the scope of the Comarch Group's Consolidated Financial Statements for the 12-month period ended 31 December 2025. The document covers all entities forming part of the Comarch Group that have been included in the financial consolidation.

This report applies to the value chain at the level of the Group's own operations and significant upstream and downstream elements. The assessment of the materiality of impacts, risks and opportunities takes into account relationships within the value chain to the extent that the Comarch Group can exert a real influence or where an increased risk of impact has been identified. Policies, actions and objectives in the area of sustainable development apply primarily to the Group's own operations; however, in specific areas – such as respect for human rights, diversity and responsible procurement practices – they also cover key partners in the supply chain.

Data relating to higher and lower levels of the value chain are taken into account in terms of the availability of information and the extent of the Comarch Group's control or influence, in particular when disclosing non-financial metrics.

The main area where limitations on data availability arose relates to Scope 3 greenhouse gas emissions, as described in detail in disclosure E1-5.

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

1.2. Disclosures in relation to specific circumstances

BP-2

Time perspectives

For the purposes of this Report, the Comarch Group has adopted an approach consistent with the requirements set out in the ESRS. To ensure the 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 (over 5 years).

For the purposes of analysing climate scenarios and the resilience of the business model, as described in detail in Chapter E1.IRO-1, the Comarch Group has adopted its own definitions of time horizons, guided by the time horizons most commonly used in the analysed climate scenarios in IPCC and IEA reports. The following time horizons have been adopted:

Definitions of time horizons adopted for the purposes of the climate analysis:

- **Short term (up to 2030):** Focus on current climate policies, the implementation of short-term measures and their impact on operational activities,
- **Medium term (2030–2050):** Taking into account the transformation of the energy sector and long-term investment decisions,
- **Long term (up to 2080):** Assessment of the effects of achieving the Paris Agreement targets and their impact 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 using indirect sources is Scope 3 greenhouse gas emissions (GHG Scope 3). Due to the limited availability of complete actual data from suppliers and partners, these emissions have been calculated partly on the basis of available actual data and partly on the basis of indirect sources and estimates. The overall level of accuracy for Scope 3 is assessed as moderate, although this varies depending on the category and the methodology applied. Detailed information on the calculation methodology is presented in sub-section E1-6 of this Report.

With regard to own operations, the estimated metric was the resources input into the facility. Due to the lack of information on actual masses, the number of units purchased and average unit weights, based on manufacturers' specifications, were used. The level of accuracy of the estimate is high for volume and good for total mass. The use of manufacturers' specifications limits the risk of material misstatements despite the absence of physical weighing of each unit. Detailed information on the calculation methodology is presented in sub-section E5-4 of this Report.

Changes in the preparation or presentation of sustainability information

In 2025, the entity decided to change the way it presents data on family leave as part of its disclosure under ESRS S1-15, compared with the data published for 2024.

In the previous reporting period (2024), employees eligible for family leave were defined as those covered by legislation, organisational policy, agreements, contracts or collective agreements that provide for the right to family leave, who had notified the entity of their entitlement and were included in the records. From 2025, the Company has adopted the principle that the figure 100% is reported under the heading 'percentage of eligible employees'.

Comarch Group	Original value				Adjusted value			
	Female	Male	Others	Not disclosed	Female	Male	Others	Not disclosed
Percentage of employees entitled to family leave*	25,87%	11,14%	-	-	100%	100%	-	-
Percentage of entitled employees who took family leave	100%	100%	-	-	25,87%	11,14%	-	-

This change stems from the aim to ensure full compliance with the current legal framework and the desire to align the presentation of data with current market standards. Entitlement to family leave is clearly defined in Poland by the Labour Code, which means that every employee is entitled to it by law. A similar approach has been adopted in foreign companies, based on local labour laws of a similar nature.

Reporting errors in previous periods

Adjustments have been made to the calculations for comparative data (2024) regarding the carbon footprint, following an update to the methodology and a clarification of the calculation assumptions. Details are set out in section E1-6.

In 2025, an error was identified in the calculations of the mass of resources introduced into the Comarch Group in 2024. The error stemmed from the use of an incorrect base parameter for calculating the total mass, which led to a significant overstatement of the reported figures. The total mass of resources introduced originally reported was 557.56 Mg, whilst the corrected figure following the rectification of the error is 9.90 Mg. Consequently, the data for the previous year was recalculated and adjusted to ensure its reliability and comparability. Details are set out in section E5-4.

Group-specific disclosures

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

Use of transitional provisions

In accordance with the transitional provisions set out in the ESRS, the Comarch Group has decided to make use of the option to temporarily refrain from disclosing certain information. In particular, the 2025 Annual Report does not disclose:

- a financial assessment of material 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 for achieving climate neutrality by 2050 across Scopes 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 intended to ensure the quality and reliability of the disclosed data and to enable the development of realistic and measurable decarbonisation pathways.

2. Conduct of business

2.1. The role of administrative, management and supervisory bodies

GOV-1

In 2025, the process of delisting Comarch S.A.'s shares from trading on the Warsaw Stock Exchange was completed; meanwhile, in accordance with the provisions of the Commercial Companies Code, the Company had a Supervisory Board operating as a body separate from the Management Board, exercising ongoing supervision over the Company's activities. No representatives of employees' organisations sit on any of these bodies.

The Supervisory Board of Comarch S.A. as of 31 December 2025:

- Elżbieta Filipiak – Chair of the Supervisory Board,
- Krzysztof Krawczyk – Vice-Chair of the Supervisory Board since 10 December 2024,
- Maciej Godek – Member of the Supervisory Board since 1 October 2025

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

- Elżbieta Filipiak – Chair of the Board,
- Krzysztof Aniola – Vice-Chair of the Supervisory Board from 1 June 2026,
- Maciej Godek – Member of the Supervisory Board.

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

Following the change in the Company's status to that of an unlisted entity, Comarch S.A. ceased to be a public-interest entity. Consequently, the responsibilities of the former Audit Committee were integrated into the general remit of the Supervisory Board.

In 2025, **the Supervisory Board** oversaw the day-to-day operations of the Company and the Comarch Group, in particular by:

- monitoring and analysing the financial and organisational situation,
- assessing the implementation of the strategy by the Management Board of Comarch S.A.,
- setting business objectives for members of the Management Board and assessing their achievement,
- assessing the performance of selected business areas,
- analysing and assessing the risks associated with the business,
- overseeing the internal control system,

- overseeing the reporting process, financial audit and sustainable development,
- monitoring the effectiveness of the internal control, risk management, compliance and internal audit systems,
- **verification of the independence of the statutory auditor and the entity authorised to audit financial statements and certify the Sustainability Report.**

The Compliance and Internal Audit Department prepared and submitted to the Supervisory Board an annual report covering ESG issues, which the members of the Board reviewed.

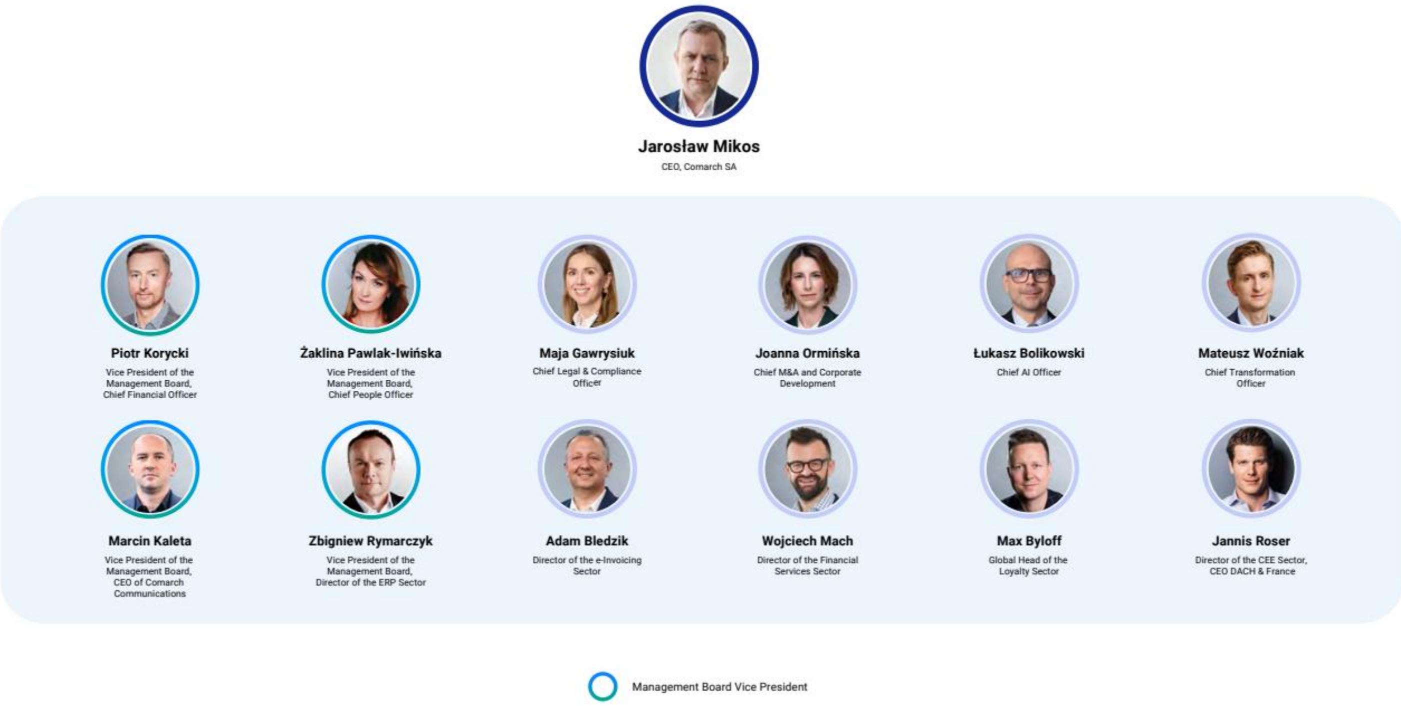
Key issues addressed in this document included:

- current and upcoming legal requirements in the ESG area,
- the progress of the sustainability report preparation process,
- the process and results of the double materiality assessment carried out within the Comarch Group in accordance with the requirements of the CSRD,
- planned actions in the area of sustainability.

The **Management** Board **of Comarch S.A.** as at 31 December 2025:

- Jarosław Mikos – Chairman of the Management Board,
- Marcin Kaleta – Deputy Chairman of the Management Board,
- Michał Mędrala – Vice-Chairman of the Management Board,
- Joanna Bilewicz-Porzycka – Vice-Chair of the Management Board,
- Piotr Korycki – Vice-Chairman of the Management Board,
- Zbigniew Rymarczyk – Deputy Chairman of the Management Board.

Responsibility structure of **the Management Board of Comarch S.A.** – as of the date of this report:



The members of the Management Board coordinate the activities of Comarch S.A. and the subsidiaries of the Comarch Group in Poland and abroad. The Management Board comprises:

Jarosław Mikos – Chairman of the Management Board,

Marcin Kaleta – Deputy Chairman of the Management Board,

Piotr Korycki – Deputy Chairman of the Management Board,

Zbigniew Rymarczyk – Vice-Chairman of the Management Board,

Żaklina Pawlak-Iwińska – Vice-Chair of the Management Board.

As at the date of this report, 80% of the members of the Management Board of Comarch S.A. were men. All members of the Management Board have many years' managerial and expert experience in areas key to the Comarch Group, particularly in the management of technology-based businesses, operations, finance and human capital, gained both within the Comarch Group and in leading international organisations and digital companies.

The Management Board of Comarch S.A. is supported by a management team responsible for the day-to-day implementation of the company's strategy and the efficient management of individual operational areas. The management team comprises: Maja Gawrysiuk – Chief Legal & Compliance Officer,

Joanna Ormińska – Head of M&A and Corporate Development,

Łukasz Bolikowski – Chief AI Officer,

Mateusz Woźniak – Chief Transformation Officer, Adam Bledzik – Director of the e-Invoicing Sector,

Wojciech Mach – Head of the Finance Division,

Max Byloff – Loyalty Sector Director,

Jannis Roser – CEE Sector Director, CEO for DACH & France.

As at the date of this report, 75% of the management team were male.

The Comarch Group has an ESG Committee appointed by the Management Board of Comarch S.A., which acts in an advisory capacity, supporting the management body in the strategic management of environmental, social and corporate governance issues. The Committee comprises representatives of senior management responsible for key operational, legal and administrative areas relating to sustainable development within the Comarch Group; the Committee's tasks include reporting to the Management Board on the results of its work and submitting recommendations regarding ESG activities.

The ESG Committee also supports the Management Board in setting sustainability targets and monitoring progress towards achieving them. Committee meetings are held at least once every six months, and more frequently if necessary – should issues arise that require an urgent response.

Members of the Management Board have constant access to specialist knowledge in the field of sustainable development, including through collaboration with internal and external experts from the Comarch Group and participation in internal projects (e.g. materiality assessments). The competencies acquired support the effective management of risks, opportunities and impacts, and also ensure the ability to oversee the objectives and progress in implementing the Comarch Group's sustainability strategy. During the reporting period, a key element in developing the Management Board members' competencies in the ESG area was the delivery of an internal training session in the form of an expert presentation. The training covered issues relating to the launch of the decarbonisation project, the importance of implementing ESG principles in the company's operations, the role of the Management Board in the sustainability reporting process, and a presentation of the ESG results achieved by the Comarch Group.

Detailed information on the experience and competencies of the management and supervisory personnel can be found on the Company's website at https://www.comarch.pl/o-firmie.

In 2025, the Management Board of Comarch S.A. examined key issues relating to sustainable development, such as:

- legal requirements in the area of ESG,
- best practices and initiatives in the field of ESG,
- the Company's position in ESG rankings and rating portals,
- the role of the Management Board in reporting on sustainability issues,
- the expectations of customers and financial institutions,
- actions to achieve climate neutrality,

- progress in implementing the ESG strategy.

Competences of the management and supervisory bodies

The members of the Supervisory Board representing the main shareholders – Elżbieta Filipiak, Krzysztof Aniola and Maciej Godek – possess expertise in strategic management, finance and the supervision of large business entities.

Expertise in areas critical to the Comarch Group is provided by the members of the Management Board and the ESG Committee appointed by them. The members of the Management Board, who have many years' experience in the technology sector, possess expertise in the management of technology businesses and operations:

- Jarosław Mikos (Chairman of the Management Board) – responsible for strategic oversight of the Comarch Group's operational and technological activities, bringing extensive experience in managing large-scale technology projects and digital companies.

- Zbigniew Rymarczyk (Deputy Chairman of the Management Board, Head of the ERP Sector) – an experienced manager and expert in the fields of management and finance, with over 25 years' experience in the IT and modern technology sector.

- Marcin Kaleta (Deputy Chairman of the Management Board, Chief Executive Officer) – brings to the Management Board expert knowledge in the field of cybersecurity and data protection. He has many years' operational experience in the IT sector and extensive expertise in technology management and digital transformation.

- Piotr Korycki (Deputy Chairman of the Management Board, CFO) – is responsible for finance and accounting; he has many years' experience in corporate finance management, including in the media sector, where he was involved in IPOs, mergers and integrations with US companies.

- Joanna Bilewicz-Porzycka (Deputy Chair of the Management Board, Chief People Officer) – in 2025, she was responsible for HR policy within the management body. She has over 20 years' international experience in strategic human capital management, gained in Europe and Asia, amongst other places.

- Żaklina Pawlak-Iwińska (Vice-Chair of the Management Board) – has held the role of Chief People Officer since 1 June 2026. She has over 19 years' experience in strategic director-level positions in the CEE region. Previously associated with Nexi Group (HR Director for the CSEE region), Polskie ePłatności and Przelewy24, she also has extensive experience on management and advisory bodies.

Oversight of the sustainability (ESG) area is exercised by the ESG Committee, which reports directly to the Management Board. The Committee is responsible for coordinating activities related to the implementation of the ESG strategy, monitoring progress and supporting the Management Board in decision-making regarding the management of environmental and social impact and corporate governance. In its work, the Committee draws on the support of internal and external experts, including through strategic cooperation with Schneider Electric on decarbonisation initiatives and with the UN Global Compact on business ethics and responsible management standards.

Further information on risk management, including ESG-related risks, can be found in sub-section GOV-5 of this sustainability report.

Representatives of the governing bodies of Comarch Group companies are citizens of various countries. The table below presents the structure of the governing and supervisory bodies by diversity category for the years 2024–2025. The count is based on roles held as at 31 December – one person may hold several roles. Following the delisting of Comarch S.A. shares from the stock exchange and the change in the Company's status to a private company, the Comarch Group did not conduct a formal assessment of the independence of members of the management and supervisory bodies, and the independence ratio was neither monitored nor reported.

Year	Governing body	Age	Female	Male	Total
31 December 2025	Supervisory Board	under 30	-	-	-
		30–50	3	10	13
		over 50	6	14	20
		Total	**9**	**24**	**33**
	Management	under 30	-	-	-
		30–50 years	15	84	99
		over 50	10	59	69
		Total	**25**	**143**	**168**
Total			**34**	**167**	**201**

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

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

GOV-2

During the reporting period, matters relating to sustainable development were reported on a regular basis directly to Jarosław Mikos, Chairman of the Management Board of Comarch S.A., by the Chief Legal & Compliance Officer. Sustainability-related matters were also discussed at meetings of both the Management Board and the Supervisory Board of Comarch S.A. These bodies were briefed on current ESG activities undertaken within the Comarch Group, including progress in implementing reporting obligations in accordance with the ESRS and the development of a decarbonisation plan. The ESG Committee is responsible for sustainability issues on behalf of the Management Board of Comarch S.A. This Committee actively participated in the double materiality analysis process, supporting the identification of material issues both from the perspective of their impact on the environment and their financial significance for the Comarch Group.

The Management Board of Comarch S.A. annually approves the identified risks and opportunities – including those related to sustainability – as part of the risk management process, which operates across the entire Comarch Group in accordance with the applicable Risk Management Procedure. This analysis takes into account their potential impact on strategy and operational activities.

During the reporting period, the following ESG-related risks and opportunities, amongst others, were identified as significant:

Risks:

- transformative and regulatory developments in the field of climate change,
- rising electricity prices and potential supply disruptions resulting from climate change,
- a shortage of human capital and the loss of key skills,
- cyber security and personal data protection – the risk of data breaches.

Opportunities:

- the development and production of software to help companies identify, monitor and effectively reduce their carbon footprint, as well as with ESG reporting,
- a moderate reduction in costs through the partial use of renewable energy sources,
- increased staff engagement and satisfaction,
- improved service standards through enhanced staff skills.

Sustainability issues are also an integral part of the annual "Report on the functioning of the internal control system, risk management and compliance, as well as the internal audit function within the Comarch Group", which is prepared by the Compliance and Internal Audit Department and submitted to the Supervisory Board of Comarch S.A. This report contains 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 Management Board's actions regarding material ESG risks included determining acceptable risk levels, selecting response strategies—including the approval of related expenditure—and overseeing the activities of risk owners.

Significant sustainability issues (impacts, risks and opportunities) addressed by the Management Board or the Supervisory Board during the reporting period included, amongst others:

- establishing cooperation with Schneider Electric on decarbonisation initiatives,
- updating the composition of the ESG Committee,
- matters relating to energy and emissions, including investments in renewable energy sources (RES), the conclusion of contracts for the purchase of energy from RES, and the implementation of energy-efficient solutions,
- matters relating to human resources policy,

- matters concerning cybersecurity and the protection of personal data,
- approval of updates to the Code of Ethics,
- approval of internal regulations on compliance, risk management and corporate governance,
- approval of donations to foundations and public sector bodies.

Detailed information on expenditure and activities is set out in the sections devoted to the individual ESG aspects.

2.3. Integration of sustainability-related performance in incentive schemes

GOV-3 The Comarch Group has not implemented any incentive schemes or remuneration policies linked to sustainability issues in relation to members of its administrative, management and supervisory bodies. At present, the Comarch Group has no plans to implement such measures either.

2.4. Statement on due diligence

GOV-4 In 2025, the Comarch Group continued its work on improving the due diligence process, which involves the identification, assessment and management of adverse impacts relating to human rights and the environment throughout the Comarch Group's value chain. As part of this process, Comarch carries out activities aimed at preventing potential adverse impacts, mitigating them and monitoring the effectiveness of the measures taken, in accordance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. In particular, this process covers, amongst other things, the areas of supplier relationship management, compliance with environmental regulations and respect for human rights.

CORE ELEMENTS OF DUE DILIGENCE	PARAGRAPHS IN THE SUSTAINABILITY STATEMENT
Embedding due diligence in governance, strategy and business mode	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 the sustainability reporting

GOV-5 The process of identifying and assessing risks, including those related to sustainability reporting, is integrated into the Comarch Group's company-wide risk management system, the principles of which are set out in the Risk Management Policy.

Risk management within the Comarch Group is carried out as a cyclical process comprising the following stages:

- Risk assessment – the identification and assessment of potential threats and opportunities, taking into account the consequences of a risk materialising and the likelihood of its occurrence. Priority is given to those risks that score highly in this assessment and may significantly affect results, reputation or regulatory compliance, including in relation to the Sustainability Report,
- Risk management – defining risk management mechanisms and response strategies (including avoidance, minimisation and acceptance of risk),
- Control and reporting – monitoring risks and providing management and reporting information,
- Subsequent iterations of the process – regular updates and reviews of risks in light of changing internal and external circumstances.

The Compliance Director is responsible for initiating and coordinating the risk management process. His duties include, amongst other things, the periodic collection and updating of risk data – at least once a year – and the submission of this data to the Management Board of Comarch S.A. in the form of a Risk Map and an Opportunity Map, taking into account both the threats and opportunities identified within the Comarch Group. This assessment also covers issues relating to ESG risks and opportunities. Monitoring of the implementation of risk management mechanisms takes place every six months.

Risk owners, i.e. the heads of organisational units, are responsible for the day-to-day management of risk in the areas under their management.

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

- defining the levels of risk acceptable to the organisation,
- selecting risk response strategies,
- overseeing the activities of risk owners.

With regard to the internal control and risk management system governing the preparation of the sustainability report, the Comarch Group follows principles analogous to those applied to financial reporting.

Although the Comarch Group does not have a formalised procedure for the preparation and approval of its sustainability report, it follows well-established internal practices in this area, ensuring the consistency of this process and its compliance with applicable regulations. Business transactions 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 carried out by teams of specialists from, amongst others, the ESG, Compliance and Internal Audit, HR, Quality, Accounting, Controlling and Finance departments, under the supervision of the ESG Committee. The Comarch Group's 2025 sustainability report was subject to a voluntary limited assurance review by an independent auditor.

The main risks identified in relation to the sustainability report include:

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

To mitigate these risks, measures include, amongst others, access controls in IT systems, multi-stage data verification by expert teams, the designation of data owners, and internal approval workflows.

3. Strategy

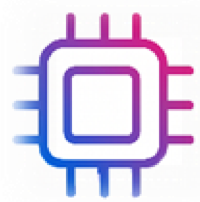
3.1. Strategy, business model and value chain

SBM-

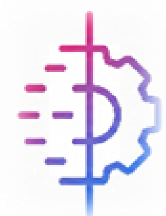
The Comarch Group, whose parent company is Comarch S.A. with its registered office in Kraków, operates in the field of designing, implementing and maintaining IT solutions, classified under PKD 62.01.Z. The business model is based on creating comprehensive solutions based on proprietary products utilising artificial intelligence technology. A team of qualified specialists and an extensive technological infrastructure enable Comarch not only to supply software, but also to provide implementation, maintenance, consultancy and integration services to clients worldwide.

The Comarch Group's portfolio is very broad and offers comprehensive solutions for many key sectors of the economy. The Comarch Group's main product lines include:

Communications



IT & Infrastructure



ERP

E-invoicing

Finance

Loyalty

In 2025, the Comarch Group redefined its business portfolio, focusing on key business segments, namely IT operations. Consequently, during the reporting period, the Group divested selected business lines that no longer aligned with its long-term strategy of building a global competitive advantage.

<u>Significant changes to product and service groups</u>

In 2025, the Comarch Group removed the following areas from its portfolio:

· Sports operations: In August 2025, the majority stake in KS Cracovia S.A. and the company Cracovia Hokej sp. z o.o. were sold,

· Medical and diagnostic sector: The Comarch Group decided to withdraw from the medical and diagnostic services sector; consequently, the sale of Comarch HIS sp. z o.o. was finalised in December 2025, and in February 2026 the Group withdrew from Comarch Healthcare S.A. (CM iMed24).

· Public sector (APUS): In December 2025, the sale of this sector to CGI was finalised, thereby bringing to an end the provision of solutions for public administration.

Key markets and customer groups served

As a result of the above measures, there has been a reduction in the focus on directly serving two client groups, namely public institutions and the healthcare sector. These changes have not affected the Comarch Group's presence in key geographical markets, but only the profile of the services offered there.

Number of employees by geographical area

The divestment processes resulted in the transfer of specialised teams to new owners, which affected the employment structure mainly in Poland.

The Comarch Group operates globally, with 53 companies in 31 countries, across 5 continents, in 65 cities. Comarch's clients include organisations from sectors such as telecommunications, finance, FMCG, manufacturing, insurance, travel and e-commerce. The Comarch Group provides services to both large organisations and SMEs. Its operations are supported by geographically dispersed data centres (including in Poland, Germany, France and the USA), as well as the Comarch Cloud infrastructure, which ensures a secure and scalable IT environment.

The number of employees by geographical region is shown below.

Country	Number of employees	
	2025	2024
Poland	3 963	4 759
ROOF	236	248
Europe – other	181	228
North and South America	48	61
Asia	60	102
Total employees	**4 488**	**5 398**

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

The entity does not operate in the following sectors: fossil fuels, chemical production, the production of controversial types of weapons (cluster munitions, anti-personnel mines, chemical and biological weapons, and nuclear weapons), or the cultivation and production of tobacco.

The Comarch Group carried out a comparative analysis of companies in the IT sector. The aim of this analysis was to identify and assess key aspects of sustainable development affecting the operations of the companies under review, as well as to determine common areas of risks, opportunities and impacts typical of the sector.

The results of the analysis constituted one of the key sources of input data for the process of identifying the Comarch Group's actual and potential impacts, risks and opportunities (IRO). It was demonstrated that the main thematic areas identified within the IT sector coincide with the Comarch Group's IROs described in sub-section SBM-3, including in terms of their potential links to the Group's own business model or value chain. This applies in particular to issues such as: cybersecurity and data protection, energy consumption by IT infrastructure and its impact on climate change, working conditions, business operations, and the development of products supporting customers' sustainable development.

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

The Comarch Group has a strategy in place that sets out its objectives and key areas of focus in the field of ESG and sustainable development. This document defines the Comarch Group's ambitions over a five-year period, focusing on minimising its environmental impact and building responsible relationships with its stakeholders.

The strategic objectives and priorities in the area of sustainable development have been defined on the basis of identified key impacts, risks and opportunities. The ESG objectives focus on the areas of greatest significance to the Comarch Group's operations. In the environmental sphere, they relate to reducing greenhouse gas emissions and improving energy efficiency. In the social sphere, they address impacts and opportunities related to working conditions, diversity and support for local communities. In the area of corporate governance, these objectives stem from the need to mitigate identified risks and capitalise on opportunities by further improving management standards.

Current strategic priorities include:

- reducing CO_2 emissions per employee by 20% by 2027 (compared to 2021),
- increasing the share of energy from the Group's own renewable sources to 20% of total consumption by 2027,
- taking ongoing measures to improve energy efficiency,
- continuously improving working conditions and enhancing staff development opportunities,
- promoting diversity and equality, including by supporting the professional development of women employed within the organisation: a steady increase in the proportion of women in the workforce and achieving a proportion of women in managerial roles commensurate with the proportion of women in the workforce as a whole,
- safeguarding important social interests through dialogue with local communities, supporting sport and promoting a healthy lifestyle, undertaking initiatives in the fields of culture and education, and popularising science,
- providing financial assistance to those in need and supporting charitable causes,

- strengthening the organisation's ethical culture through awareness campaigns and training on ethics and compliance within the company,
- improving the functioning of systems, including: compliance management, risk management and internal control,
- cooperating with customers and suppliers to promote sustainable development, including through a commitment to ethical principles, respect for working conditions and compliance with social and environmental criteria,
- maintaining dialogue with all stakeholders, including the provision of accurate, timely and reliable information on non-financial data, whilst taking into account the TCFD's recommendations on climate-related reporting.

The full text of the document is available at: https://www.comarch.pl/relacje-inwestorskie/lad-korporacyjny/.

In connection with the planned submission this year of an application to set targets based on the Science Based Targets initiative (SBTi), the Sustainability Strategy will be subject to review and update in the near future. This process will enable us to align our climate targets with the latest scientific guidelines and global decarbonisation standards.

The Comarch Group offers IT products and services that support the achievement of sustainable development goals – both in its own operations and in those of its clients. Solutions such as Comarch Cloud, ERP, BI and EDI systems help to reduce energy and resource consumption and improve clients' operational efficiency.

The Comarch Group also supports clients in adapting to growing regulatory requirements in the ESG area (including the CSRD and the EU Taxonomy), by providing tools for the collection, analysis and reporting of non-financial data. Furthermore, by developing solutions that support the digitalisation of public and healthcare services and improve data security, the company also supports social objectives and corporate governance.

Comarch's offering addresses the needs of various customer groups by integrating environmental, social and corporate governance objectives. In this way, the Comarch Group is strengthening its positive impact and developing tools to support customers in their ESG transformation.

Business model

The Comarch Group's business model is based on technological expenditure and significant investment in human capital. Intellectual capital is a key asset, and its development is a strategic priority. These investments support the development of innovative products aligned with sustainable development goals and strengthen the Comarch Group's position as a provider of modern and secure IT solutions.

The Comarch Group consistently pursues a strategy based on:

- investment in human capital,
- setting market standards in the field of AI and delivering innovative solutions that form the foundation for clients' business growth,
- the development and sale of IT solutions based predominantly on its own products,
- focusing on the Comarch Group's key business segments,

- expanding sales in foreign markets, particularly in Western Europe (especially the DACH region), North America and Asia,
- continuously improving operational efficiency through the refinement of procedures and cost rationalisation,
- developing new business areas, particularly in the fields of e-commerce services, loyalty programmes and financial market-related services,
- promoting a service-based IT sales model, particularly solutions based on Comarch Cloud technology,
- investing in its own technologies and IT infrastructure, including outside Poland.

The Comarch Group's key objective is to ensure data security and availability for its customers. The Comarch Group has its own IT infrastructure, including data centres in Poland, Germany, France and the USA, which ensures operational independence and control over its environmental impact. These investments respond to the global growth in demand for cloud services and customers' increased sensitivity to climate issues.

The Comarch Group provides clients with innovative and secure IT solutions that support their digital transformation, boost efficiency and help them achieve their sustainability goals. Investors benefit from the Comarch Group's stable financial position, strong research and development capabilities, and growing presence in international markets, reinforced by a strategic partnership with CVC Capital Partners. Comarch offers its employees and business partners opportunities for skills development, including through the AI Academy, a safe working environment and social engagement, thereby fulfilling both its economic objectives and its social responsibility.

The Comarch Group's value-building strategy is closely linked to the company's corporate culture. Shared values and work ethics serve as a guide for decision-making processes, reflect the Comarch Group's ambitions and working style, and determine the quality of relationships with partners and associates. The most important values of this strategy are recognised as:

- We work shoulder to shoulder
- We are driven by AI
- We are constantly pushing the boundaries for our clients
- We reach our goals
- We don't stop – we go one step further

The newly established People division oversees the transformation of our organisational culture towards creating an environment that supports employee development.

Value chain

The Comarch Group's value chains have been developed based on Michael Porter's value chain model, focusing on key operational processes and support activities. A fundamental part of the value chain are the operational processes within the Comarch Group, i.e. all key processes related to creating value for the customer. Within the Comarch Group, research and development are of particular importance in this area, as they enable the continuous improvement of products and services. Furthermore, as part of its software development activities, the Comarch Group focuses on developing modern IT solutions that meet market needs. Implementation and maintenance services ensure the smooth roll-out of products and their subsequent support, whilst the provision of IT services guarantees comprehensive customer support in the field of IT technology and infrastructure.

Comarch Group employees also play a key role in creating value for the customer. Their knowledge, skills and commitment form the foundation of the quality of the products and services we deliver.

Support functions underpin core processes and are essential to ensuring the smooth running of the entire organisation. In this area, administrative processes, human resources management, and attention to health and safety at work play a key role. Training, finance, accounting and controlling are essential for maintaining operational efficiency, whilst legal services, internal IT support, and marketing and advertising activities bolster the company's image and its growth in the market.

Within the Comarch Group's value chain, inbound logistics is identified as the 'upstream' phase, encompassing all relationships, processes and activities related to the procurement of input resources for the organisation. A key role in this area is played by a diverse range of suppliers, on whom the effective execution of the company's core activities depends.

These include technology infrastructure suppliers, who provide electronic equipment and servers, as well as technology solution providers, responsible for software, licences and tools supporting development processes. External service providers, such as consultancy services, telecommunications and utility suppliers, also form an important group. Energy suppliers also play a vital role, ensuring the stability and continuity of the company's technological and operational infrastructure.

The Comarch Group offers a wide range of products and services, the delivery of which requires collaboration with suppliers who complement its own portfolio of services and licences and enable the range to be expanded to include third-party products.

The portfolio of third-party products consists primarily of brands and manufacturers well-known on international markets. Cooperation takes place mainly through local authorised distributors, who assist in efficiently resolving logistical issues and organising prompt delivery to the customer.

The downstream part of the Comarch Group's value chain refers to activities related to the end of a product's life cycle and customer relations. In this area, the Comarch Group focuses on delivering its products and services to specific customer groups, as well as on the processes that take place after the products have reached the end of their useful life.

In addition to the main value chain in the IT sector, described in detail in this disclosure, the Comarch Group also identifies three additional value chains: in the sports, healthcare and investment segments, which are presented below. It should be noted that during the reporting period there were changes to the capital structure, as a result of which the companies from the sport and medicine segments left the Comarch Group.

COMARCH

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

Suppliers (Tier 3)

Suppliers of primary raw materials that are used to manufacture components or other elements for the production of electronic equipment.

Primary raw materials:
- metals and rare earths
- carbonaceous materials
- technical gases

Recycled raw materials:
- plastics and polymers
- glass and ceramics

Energy raw materials:
- gas
- electricity
- vehicle fuels

Suppliers (Tier 2)

Direct component and service suppliers who provide key components for the assembly and production of electronic equipment.

- **Direct suppliers of components and services**
  - suppliers of finished components and parts
  - suppliers of mass production of electronic components
  - suppliers of computer accessories
- **Suppliers of consumables and technology**
  - Suppliers of electronics and advanced technology
  - Suppliers of office supplies and operational services

Suppliers (Tier 1)

Infrastructure hardware providers
- electronic equipment
- servers

Technology solution providers
- software
- licences
- software tools

External service providers
IT infrastructure
- consulting services
- telecommunications
- media

Energy suppliers

GROUP OPERATIONS

Key resources

- Human
- Intellectual
- Social
- Infrastructure
- Financial
- Organisational culture

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

USTOMER RELATIONS:
- Dedicated salespeople
- Consultants
- Internet sales
- Marketing

PARTNER RELATIONS:
- Partner sales network
- Suppliers

Waste

- Waste associated with employee housing
- Waste from production hall operations

Downstream

Customers

- Telecommunications
- Finance and Banking
- Trade and services
- Industry and utilities
- Public administration
- Medicine
- SMEs

End of life

- IT equipment and office supplies (computers and peripherals)
- Office waste

End users

- 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

Dostawcy (Tier 3)

Entities that provide raw materials, components and services to Tier 2 suppliers

Suppliers of raw materials (e.g. mines, industrial forests)

Primary raw materials:
- metals and rare earths
- carbonaceous materials
- technical gases

Processed raw materials:
- plastics and polymers
- glass and ceramics

Energy raw materials:
- gas
- electricity
- vehicle fuels

Dostawcy (Tier 2)

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.

Suppliers of raw materials (e.g. mines, industrial forests)

Producers of building materials (e.g. cement works, timber companies, brickyards)

Suppliers of components and products (e.g. concrete and steel elements, windows, bricks)

Dostawcy (Tier 1)

Entities that provide products and services directly to the Group supporting its daily operations.

Plot vendors
(companies and individuals)

Design and planning service providers
(architectural studios, experts)

Providers of construction services
(larger and smaller general construction and specialist companies)

Providers of specialised services
(marketing, analysis, building maintenance)

Transport service providers

Utility providers

Energy suppliers

GROUP OPERATIONS

Key resources

- Human and intellectual
- Social
- Financial

Primary activities

Real estate investments
- 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
- 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

Support activities

Human resource management
Occupational health and safety
Financial management
Quality management
Risk management
Legal services

Downstream

Customers

private home buyers
office tenants
retail tenants
agents and brokers acting on behalf of prospective tenants or purchasers

Waste

municipal waste
construction and demolition waste
hazardous waste

End users

- Employees of tenants of office space
- Housing buyers

VALUE CHAIN – SPORT SEGMENT

Identified the stakeholders who interact with the value chain processes

Upstream	Group Operations	Downstream
Suppliers of goods and services	Players, sports staff, administrative staff, management staff and sponsors	sports team supporters

Upstream

Suppliers (Tier 3)

Entities that supply raw materials, components and services to Tier 2 suppliers

Material and component manufacturers

Primary resources:
- rare earth metals and elements
- carbonaceous materials
- technical gases

Processed raw materials:
- plastics and polymers
- glass and ceramics

Energy raw materials:
- gas
- electricity
- vehicle fuels

Water

Suppliers (Tier 2)

Tier 2 suppliers are those who provide products and services to Tier 1 suppliers rather than directly to the sports club. They are those who support the infrastructure and activities of the club indirectly.

Manufacturers of sportswear and equipment

Vehicle manufacturers

Dostawcy paliw

Firmy leasingowe i serwisowe

Printers and producers of advertising materials

Copywriters and freelancers

Suppliers of club gadgets

Suppliers (Tier 1)

These are entities that provide products and services directly to the COMPANY supporting its daily operations.

Suppliers of sportswear and equipment

Medical and regeneration service providers

Marketing agencies

Logistics and transport providers

External service providers
- IT infrastructure
- training
- telecommunications
- media
- cleaning services
- security services

Energy suppliers

GROUP OPERATIONS

Primary activities

Inbound Logistics

Personnel policy

Youth development

Player transfers

Management of sports facilities (stadiums, swimming pools, gyms and ice rinks).

Purchase of sports equipment

Operations

Team development
- selection of management
- building organisational culture.

Training and development of players

Organisation of matches and events

Outbound Logistics

The team's presence at competitions and in the media.
- Organising trips to matches and training camps.
- Selling tickets and passes.
- Distribution of club merchandiseh

Marketing & sales

brand management and external communication

Support activities

- **Procurement:**

Sourcing of resources required for the organisation..
  - Contracts for sports equipment
  - Contracts with logistics providers
  - Negotiations with media partners.

- **Manufacturing technology and its development::**

Investment in research and development to enhance processes and products.
  - Sports data analysis
  - State-of-the-art training technologies
  - Development of apps and platforms for fans

- **Human resources management:**

Staff recruitment, training and development
  - Staff recruitment and development
  - Incentive and training programmes
  - Coaching and medical staff management

- **Company infrastructure: :**

General management, finance and accounting.
  - Financial management
  - Administrative management
  - Sports law and regulation

Downstream

End-users – supporters

Fan loyalty programmes:

Organising events and meetings with players.

Corporate social responsibility (CSR) activities and community involvement.

Waste

Municipal waste

Electronic and electrical equipment waste

VALUE CHAIN – MEDICAL SEGMENT

Identified the stakeholders interacting with the value chain processes

Upstream	Group Operations	Downstream
Suppliers of goods and services	Medical, administrative and management staff.	Patients

Upstream

Suppliers (Tier 3)

These suppliers provide the primary raw materials used to produce medical supplies, medicines, and equipment for clinics. This is the earliest stage of the supply chain and includes suppliers of natural, chemical and biomaterials.

Manufacturers of medical machinery and equipment

Non-manufacturing, marketing and engineering service providers

Raw materials for drug packaging
- Plastics
- Pharmaceutical glass
- Metals
- Paper and cardboard
- Biodegradable and eco-friendly materials

Energy raw materials:
- gas
- electricity
- vehicle fuels

Suppliers (Tier 2)

Finished intermediates and infrastructure providers for the medical sector.

Suppliers of equipment and reagents needed to carry out laboratory tests

Manufacturers of pharmaceuticals
- manufacture of pharmaceutical substances and excipients
- manufacture of products (medicines)
- manufacture of packaging

Transport and logistics

Suppliers (Tier 1)

These are the entities that provide the clinic with the products and services it needs to support its daily operations.

Medical Equipment Suppliers

Equipment service providers

Medical service providers

Pharmaceutical suppliers (pharmaceutical wholesalers).

External service providers
- IT infrastructure
- Training
- Telecommunications
- Utilities
- Cleaning services
- Renovation services:

Energy suppliers

GROUP OPERATIONS

Key resources

- Human
- Intellectual
- Social
- Infrastructure
- Financial
- Organisational culture

Primary activities

Patient care

Prevention

Diagnosis and treatment

Rehabilitation

Additional medical services

Patient health monitoring

Support activities

Clinic infrastructure

Human Resources Management

Technology and IT

Procurement and logistics

Downstream

Waste

Hazardous medical waste

Non-hazardous medical waste

Municipal waste

Electronic and equipment waste

Użytkownicy końcowi – Pacjenci

Patient data management

Patient education

3.2. Interests and views of stakeholders

SBM-2

The Comarch Group's key stakeholders were identified on the basis of a survey conducted amongst members of the Management Board of Comarch S.A., the ESG Committee and representatives of the Human Resources Department. In addition, the environment was deemed a key stakeholder by default, given that the Comarch Group's ESG strategy clearly identifies it 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 extent to which stakeholders influence the Comarch Group.

The views, needs and expectations of stakeholders are a key element of the Comarch Group's decision-making processes and strategic direction. Dialogue with employees and their representatives directly shapes the Comarch Group's HR policy, contributing to the continuous improvement of working conditions, incentive schemes, safety standards and measures supporting a healthy work-life balance. In turn, the growing demands of business partners and regulatory trends in the ESG area act as an additional, significant driver for our environmental protection initiatives, which translates into decisions regarding the improvement of energy efficiency, the implementation of emission reduction targets, and the development of products supporting our clients' digital and green transitions.

This perspective was directly linked to the results of the double materiality analysis. The assessment of the extent to which stakeholders influence the organisation served as a key input to the IRO matrix, enabling the precise identification and prioritisation of material impacts, risks and opportunities.

The Comarch Group's most important stakeholders include:

Employees (permanent staff and contractors, interns, trainees, students and prospective employees, employees of subcontractors and suppliers, the Labour Inspectorate and other similar supervisory bodies).

Investors (shareholders, institutional investors, retail investors, brokerage houses, banks, the Polish Financial Supervision Authority (KNF), the National Depository for Securities (KDPW) and the Warsaw Stock Exchange (SEG)).

Clients (including institutional clients, retail clients, local authorities and central government).

Suppliers and subcontractors (including external consultants and IT specialists, hardware and software infrastructure suppliers, and suppliers of electricity and telecommunications services).

Government and regulatory organisations (national and international legislative bodies and supervisory institutions).

Strategic partners (falling within the other stakeholder categories, depending on the nature of the collaboration; the Comarch ERP partner network; technology partners).

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

***End users** (including: communities of users of Comarch solutions (often sole traders), clients' employees, beneficiaries of loyalty programmes, clinic patients, sports fans) have been identified as a stakeholder group having **indirect contact with the Comarch Group**, subject to changes resulting from the departure of companies from the medical and sports sectors from the Comarch Group.*

*Given the business model based on the sale of products and services in B2B (business-to-business) relationships and the marginal scope of services provided to individuals, **end users have not been considered key stakeholders of the Comarch Group**.*

The Comarch Group recognises the importance of stakeholder engagement in its operations and therefore maintains a regular dialogue with all key stakeholder groups. Within the Comarch Group, information regarding the views and interests of stakeholders in relation to sustainability issues is communicated to the administrative, management and supervisory bodies via the units responsible for ongoing dialogue with these groups. This applies, amongst others, to the departments responsible for relations with customers, employees, business partners and investors, as well as government and regulatory bodies.

For example, reports on customer satisfaction surveys and other regular analyses concerning stakeholder relations are presented to senior management and the Management Board, enabling this information to be taken into account in strategic and operational decision-making.

The methods used to engage stakeholders from each group and the objectives of the dialogue conducted with them are set out below.

Employees: recruitment, performance reviews, internal meetings, internal communication (emails, portals and internal messaging systems for staff), established channels for reporting breaches – publicised via email and accessible on the intranet.

<u>Aim of the dialogue: </u>to build a satisfying and stable working environment by better aligning with employees' expectations, supporting their development, reducing staff turnover and managing any non-compliance issues.

Investors and financial partners: one-to-one meetings, business presentations of results and teleconferences with the Company's Management Board, ongoing cooperation on behalf of Comarch's finance division, and participation in meetings with financial institutions and banks.

<u>Aim of the dialogue: </u>to ensure transparency of information, meet the information needs of key financial stakeholders, build stable value and safeguard Comarch's reputation.

Customers: website, customer satisfaction surveys, business meetings to facilitate contract fulfilment and improve the quality of services provided, organising and supporting the Comarch user community, e.g. in the form of regular meetings (including the annual Comarch User Group) or managing pages dedicated to Comarch solutions on social media platforms in accordance with internal procedures regarding the publication of external Comarch Group pages and media communication standards.

<u>Purpose of the dialogue: </u>to survey customers' expectations and opinions, to take the customer's voice into account when designing business solutions, and to create products and services tailored to customer needs.

Suppliers and subcontractors: surveys sent to suppliers, business meetings for the purposes of contract fulfilment.

Purpose of the dialogue: partnership-based cooperation with suppliers, active communication with suppliers and subcontractors, ensuring compliance with applicable legal regulations and internal ethical principles, and support in adapting to the principles of sustainable development.

Government and regulatory bodies: identifying changes in legislation and standards; actively participating in the processes of developing regulations and standards.

Aims of the dialogue: to ensure that operations comply with applicable laws, industry regulations and sustainability standards; to build transparent and constructive relationships with supervisory bodies, government authorities and international organisations.

Strategic partners: partner meetings (in-person and online), dedicated training sessions and workshops for partners, partner conferences, and individual partner pages.

Aim of the dialogue: to build long-term, collaborative business relationships; to strengthen partners' expertise and commitment to the sale and implementation of Comarch solutions; to adapt Comarch solutions to changing market needs through feedback from partners; and to provide partners with up-to-date technological and business knowledge.

Environment: cooperation with utility providers, energy producers, environmental organisations and recycling companies; monitoring the environmental impact of operations through the analysis of CO_2 emissions, energy and water consumption, and the volume of waste generated; analysis of available scientific studies and reports, including climate reports.

Aim of the dialogue: to improve the quality of the natural environment, reduce energy consumption and pollutant emissions, and minimise the amount of waste generated.

Although end-users and local communities are not a significant stakeholder group, the Comarch Group engages in dialogue with them as follows:

End users: The Unique Comarch ERP Community – Ask, Help, Improve; contact forms available on the website; patient satisfaction surveys at the iMed24 medical centre – *dialogue continued until the iMed24 medical centre leaves the Comarch Group*.

Aim of the dialogue: to understand needs, expectations and levels of satisfaction with the products on offer; to build long-term, positive relationships with end users; to provide support for the effective and secure use of the solutions on offer; and to ensure the satisfaction and loyalty of end users.

Local communities: ongoing direct communication; implementation of sponsorship projects; building partnerships; carrying out joint projects; organising educational and preventative programmes for health protection; maintaining regular contact with the media (by telephone, email, and during press conferences and briefings); organising internship programmes.

The aim of the dialogue: to raise awareness of social responsibility, to support community development, to ensure transparency of information, to support students and graduates in gaining knowledge and experience, to ensure compliance with requirements and regulations, and to create jobs.

An example of stakeholder engagement within the Comarch Group is the Unique Comarch ERP Community – Ask, Help, Improve. The Comarch ERP Community (www.Spolecznosc.Comarch.pl) is a platform where Comarch ERP customers help one another by sharing knowledge about Comarch ERP systems, as well as submitting ideas for the development of these systems. All submitted ideas can be commented on and rated by Community members; Comarch analyses the highest-rated ones with a view to implementation. Comarch Partners are also active within the Community, supporting customers with their knowledge and experience, and also submitting ideas for software development. Comarch employees also take part in the discussions.

The project is a unique initiative – it takes the form of a traditional forum for the exchange of knowledge, but also gives customers the opportunity to influence the development of the products they use on a daily basis. This is also appreciated by business owners looking for software, to whom the platform is open. Even at the stage of selecting a business management system, they can contact users of Comarch systems, ask questions, clarify any doubts and read through all the discussions.

Community activity is supported by gamification mechanisms, which results in highly dynamic interaction and a daily expansion of the knowledge base. On the platform's homepage, you can view current statistics, which as at the end of March 2026 stand as follows:

- 19 842 questions asked
- 49 904 answers
- 19 050 comments

3 807 ideas for new features and improvements to existing ones, of which over 526 have been implemented by Comarch.

S1.SBM-2

Within the Comarch Group, its own workforce constitutes one of the key stakeholder groups over which the Comarch Group exerts direct influence, and whose interests, views and human rights are taken into account when shaping its strategy and business model. The Comarch Group's strategy is based on the premise that long-term development and market competitiveness are closely linked to the quality of the working environment, team engagement and respect for human rights. Consequently, the business model incorporates measures to minimise negative impacts on employees, such as tackling inequalities, promoting diversity, ensuring safety and wellbeing, 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 channels for reporting comments and irregularities. The information gathered in this way influences the shaping of HR policies, development programmes and initiatives supporting work-life balance.

S3.SBM-2

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

S4.SBM-2

Within the value chain, the Comarch Group has not identified any consumers or end users. The main recipients of the Comarch Group's products and services are businesses; its offering is not directed at individual customers.

Consequently, the Comarch Group does not maintain any direct contractual, operational or marketing relationships with consumers or end users. For this reason, the interests, perspectives and rights of consumers as natural persons do not constitute a factor that significantly influences the Comarch Group's strategy, business model or key operational decisions.

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 dual materiality assessment process, taking into account the context of its operations, stakeholder expectations and the changing regulatory environment (including the requirements of the CSRD Directive and ESRS standards).

	Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Impact/ Risk/ Opportunity	IRO type	[S] Current and anticipated impacts / [D] Actions taken
ESRS E1	Climate change	**Climate change mitigation**		**Greenhouse gas emissions** generated across the entire value chain, covering the organisation's own activities – i.e. software production – as well as those of suppliers, including computer hardware manufacturers and their subcontractors, energy production and supply, staff commuting, and the use of products by customers.	**Own operations, Upstream**	Impact	**Negative, actual/ -**	[S] An increase in the concentration of greenhouse gases in the atmosphere, leading to global warming and an intensification of extreme weather events such as heatwaves, droughts, floods and storms. [D] Calculation of the Comarch Group's carbon footprint; implementation of planned investments aimed at reducing emissions.
				<u>Impact on people or the environment:</u> Greenhouse gas emissions contribute to climate change, leading, amongst other things, to rising temperatures, extreme weather events and the degradation of ecosystems. These phenomena have a negative impact on human health and safety, access to natural resources and the living conditions of communities around the world.	**Downstream**			
				Transformational and regulatory risks in the area of climate change. The risk that an organisation's strategy will fail to adapt to dynamic regulatory, political and social changes aimed at decarbonising the economy. This includes, in particular: - Tighter emissions requirements – the risk of new emissions standards being introduced for IT products and services, failure to comply with which may result in exclusion from tenders - Regulatory pressure, including the EU ETS and carbon taxes, which increases the cost of energy emissions, leading to high price volatility and reduced predictability of the energy costs necessary for the operation of data centres.	**Own operations**	Risk	- / short-term	[S] Increase in operating and capital expenditure linked to energy prices, emissions and infrastructure modernisation; loss of market share and reduced success in tenders to competitors offering solutions with a lower carbon footprint. [D] Calculation of the Comarch Group's carbon footprint, implementation of planned investments aimed at reducing emissions, and ESG reporting.

	Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Impact/ Risk/ Opportunity	IRO type	[S] Current and anticipated impacts / [D] Actions taken
				- Market misalignment – the risk of losing a competitive advantage as a result of slower adaptation to the requirements of a circular economy and a low-carbon footprint compared to competitors - Inability to meet expectations regarding the reduction of GHG emissions				
				Development of software to support companies in determining their carbon footprint, monitoring and effectively reducing it, as well as ESG reporting.	**In-house operations**	Opportunity	- / short-, medium- and long-term	[S] Strengthening market position by increasing the number of customers. Building the company's image as one committed to mitigating the effects of climate change. [D] Analysing market requirements, researching customer needs, presenting product demos.
		Energy		**Electricity consumption** associated with the operation of office buildings, technical infrastructure and server maintenance. **<u>Impact on people or the environment:</u>** Electricity consumption for the Group's own operations generates a significant environmental impact through greenhouse gas emissions resulting from its production and the exploitation of natural resources.	**Own operations, Upstream, Downstream**	Impact	**Negative, actual/ -**	[S] Environmental pollution associated with electricity generation, depletion of non-renewable energy resources. [D] Investments in renewable energy sources (RES) and the purchase of energy with a guarantee of origin from RES within Comarch Group companies.
				Rising electricity prices caused by increasing temperatures resulting from advancing climate change (greater demand for energy required for cooling), as well as the decreasing availability of energy resources.	**Own operations**	Risk	- / short-term	[S] Rising operating costs, particularly those associated with the operation of data centres and IT infrastructure; the need to adapt energy management strategies; and the potential passing on of some costs to customers. [D] Investments in renewable energy

	Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Impact/ Risk/ Opportunity	IRO type	[S] Current and anticipated impacts / [D] Actions taken
								sources. Modernisation of lighting to more energy-efficient systems in selected locations.
				Fluctuations in the mains voltage, power failures, power cuts or a complete lack of access to electricity. Climate change has a significant impact on electricity grids, increasing the risk of failures, power cuts and even a complete lack of access to electricity in certain regions. This impact stems from the increased frequency of extreme weather events and their effect on energy infrastructure.	**Own operations**	Risk	- / long-term	[S] Disruptions to the provision of IT and cloud services, reduced availability of critical systems, increased operating costs associated with maintaining contingency infrastructure, and a potential deterioration in the quality of customer service. [D] Investment in in-house renewable energy sources, ensuring guaranteed and backup power supply
				Moderate cost reduction through the partial use of renewable energy sources.	**Own operations**	Opportunity	- / long-term	[S] Gradual reduction in operating expenditure related to energy procurement, increased cost stability over the long term, and mitigation of the risk associated with fluctuations in conventional energy prices. [D] Investment in our own renewable energy sources.
ESRS E5	Circular economy	**Resources inflows, including resource use**		**The manufacture of electronic equipment** results in the intensive use of natural resources, in particular 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 natural resources and materials, including rare-earth metals, by entities operating within the value chain leads to the	**Upstream**	Impact	**Negative, actual/ -**	[S] Depletion of natural resources leading to rising raw material costs, disruptions in supply chains and increased operational risk. [D] Supplier analysis. Conduct an analysis of the supply chain structure with a view to identifying suppliers particularly vulnerable to risks associated with limited availability of natural resources. Verification of environmental practices and raw material management strategies among key

	Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Impact/ Risk/ Opportunity	IRO type	[S] Current and anticipated impacts / [D] Actions taken
				overexploitation of limited natural resources, environmental degradation and increased pollutant emissions.				suppliers, implementation of due diligence principles, and diversification of supply sources to minimise the risk of disruptions.
		Waste		**Generation of waste** in the company's own operations (in particular electronic waste) and throughout the value chain. **<u>Impact on people or the environment:</u>** Processes taking place within the company's own operations and throughout the value chain result in the generation of various waste streams. This has a negative impact on the environment through soil, water and air pollution, increased pressure on waste disposal systems, and emissions associated with waste transport and treatment	**Own operations, Upstream, Downstream**	Impact	**Negative, actual/ -**	[S] Environmental pollution caused by waste. [D] Adapting operational processes and waste management to increasingly stringent legal regulations, including EU legislation on waste management. Implementing separate waste collection, collaborating with certified waste recipients, and digitally monitoring waste streams.
ESRS S1	In-house workforce	**Working conditions**	**Secure employment**	Creating high-quality jobs and ensuring stable and secure employment conditions for staff. **<u>Impact on people or the environment:</u>** Offering a safe and stable workplace has a positive impact on employees' quality of life, providing them with a sense of job security.	**Own operations**	Impact	**Positive, actual/ -**	[S] Increased staff motivation and engagement. [D] Implementation of the business strategy through the HR Policy, Work Regulations, Remote Working Regulations and Code of Ethics.
				Human capital deficit and loss of key competencies. Systemic risk stemming from a potential failure to provide appropriate and attractive working conditions (understood as a lack of competitive remuneration, limited career progression or an imbalance in work-life balance). These factors directly contribute to a decline in engagement,	**Own operations**	Risk	- / short-, medium- and long-term	[S] Increased staff turnover; reduced operational efficiency and a rise in the failure rate of IT projects. [D] Establishment of a dedicated People Division; increased expenditure on non-wage benefits; implementation of flexible working models (hybrid working, flexible hours); conducting regular engagement surveys.

	Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Impact/ Risk/ Opportunity	IRO type	[S] Current and anticipated impacts / [D] Actions taken
				which in turn triggers a process of increased staff turnover. The departure of experienced specialists creates gaps in human resources and leads to the loss of unique expert knowledge (know-how). The cumulative effect of these phenomena limits the Comarch Group's operational capacity to deliver IT contracts on time and to a high standard.				
				Increased employee engagement and satisfaction This opportunity stems from building an organisational culture based on a sense of purpose, which strongly binds employees to the company and reduces their propensity to change jobs. High engagement acts as a natural barrier to staff turnover, safeguards intellectual capital and strengthens the company's image as a stable and responsible employer, which is a key measure of the organisation's social maturity.	**Own operations**	**Opportunity**	- / short-, medium- and long-term	[S] Reducing recruitment costs and increasing operational efficiency through greater proactivity and reduced absenteeism amongst teams. [D] Establishment of a dedicated People Division; increased investment in non-wage benefits; implementation of flexible working models (hybrid working, flexible hours); conducting regular engagement surveys.
			Working time	Implementing transparent and employee-friendly working time arrangements, offering flexible employment models, including the option of hybrid working.	**Own operations**	Impact	**Positive, actual/ -**	[S] Increased work efficiency; the Comarch Group is perceived as an attractive employer by current and prospective employees. [D] Implementation of the business strategy through Work Regulations and Remote Working Regulations.
			Adequate wages	**Adequacy of remuneration and benefits schemes** The remuneration system at the Comarch Group is adjusted to market conditions and the current economic situation, which in 2026 will result in	**Own operations**	Impact	**Positive actual/ -**	[S] Enhancing the perception of the Comarch Group as an attractive employer and reducing staff turnover. [D] Implementation of the business strategy through the HR Policy and the Remuneration Regulations.

	Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Impact/ Risk/ Opportunity	IRO type	[S] Current and anticipated impacts / [D] Actions taken
				the implementation of a benefits programme.				
			Social dialogue	Incorporating employees' perspectives into the shaping of internal policies and the working environment.	**Own operations**	Impact	**Positive, actual/ -**	[S] Increased engagement and sense of agency, greater loyalty to the Comarch Group as an employer, reduced staff turnover. [D] Incorporating employees' perspectives into the process of shaping selected internal policies and designing the working environment. Implementation of tasks resulting from dialogue.
			Work-life balance	Practices supporting employees' work-life balance, flexible working hours and the option to work remotely, all of which support a balance between work and private life.	**Own operations**	Impact	**Positive, actual/ -**	[S] Increased staff satisfaction and loyalty, reduced staff turnover, improved mental wellbeing and increased work efficiency. [D] Enabling a hybrid working model. Establishing a formal framework through the Remote Working Policy.
			Health and Safety	Comarch, recognising that office work requires appropriate workplace ergonomics and stress management, supports its employees through appropriate health and safety policies and training in ergonomic working practices, and has implemented the PN-EN ISO 45001 standard.	**Own operations**	Impact	**Positive, actual/ -**	[S] Improved working comfort, reduced risk of occupational diseases and injuries, increased productivity and reduced sickness absence, as well as enhanced employee engagement and satisfaction. [D] Implementation and maintenance of an Integrated Management System compliant with the PN-EN ISO 45001 standard, covering policy, objectives, risk assessment, and preventive and response procedures.

	Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Impact/ Risk/ Opportunity	IRO type	[S] Current and anticipated impacts / [D] Actions taken
		Equal treatment and equal opportunities for all	**Gender equality and equal pay for work of equal value**	Pay differentials for work of similar value.	**Own operations**	Impact	**Negative, actual/ -**	[S] Reduced staff motivation and engagement, lower job satisfaction, increased staff turnover. [D] Planned measures include monitoring the gender pay gap and organising training on diversity and combating prejudice.
			Training and skills development	Investing in the skills development of its employees by organising technical training, soft skills development programmes and certification courses.	**Own operations**	Impact	**Positive, actual/ -**	[S] Increasing staff efficiency, innovation and engagement, thereby strengthening the Comarch Group's competitiveness in the market and reducing the risk of staff turnover. [D] Providing access to the company's training platform, which offers e-learning courses covering technical and soft skills, available remotely. The ability to independently select training sessions, conferences and certification courses in line with one's job profile, interests and career development path.
				Improving service standards through enhanced staff qualifications This opportunity stems from the direct correlation between the technical expertise of staff and the organisation's ability to deliver innovative and reliable solutions that meet the growing demands of the market. Improving staff qualifications is not merely a developmental benefit, but a strategic mechanism for building a competitive advantage, enabling the transition from simple service provision to the role of a highly specialised technology partner. By continuously enhancing staff competencies, the company can adapt to breakthrough technologies more	**Own operations**	*Opportunity*	- / short-, medium- and long-term	[S] Building a market position as a leader in innovation and a strong employer brand. [D] Providing access to the company's training platform; compulsory AI training; collaboration with universities.

	Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Impact/ Risk/ Opportunity	IRO type	[S] Current and anticipated impacts / [D] Actions taken
				quickly, which directly improves service quality and customer satisfaction. Investing in staff development also builds their loyalty and commitment.				
			Measures against violence and harassment in the workplace	**Taking action to prevent violence and harassment in the workplace.** Comarch has, amongst other things, introduced a Code of Ethics, which forms the foundation of the organisation's values, and has also implemented mechanisms enabling breaches to be reported anonymously and securely. Comarch has implemented an anti-discrimination and anti-bullying policy.	**Own operations**	Impact	**Positive, Potential/ short-, medium- and long-term**	[S] Building a safe and inclusive working environment, strengthening employees' trust in the organisation, reducing the risk of incidents of violence and harassment, and supporting long-term engagement and staff retention. [D] In 2025, Comarch adopted an Anti-Bullying Policy, supplementing the existing Code of Ethics. As part of the Integrated Management System, a presentation and online training course on preventing workplace bullying were made available to staff. Mechanisms for the anonymous reporting of concerns are also in place, going beyond the requirements of the Whistleblower Protection Act.
			Diversity	**Disparities in the representation of women at various levels of employment.**	**Own operations**	Impact	**Negative, potential / short-, medium- and long-term**	[S] A reduction in the diversity of perspectives in decision-making processes, a decline in the organisation's innovation and adaptability, as well as a negative perception of the Comarch Group as an employer. [D] As part of its ' ' sustainable development strategy, Comarch has set a target to increase the proportion of women in managerial roles to a level commensurate with their overall share of the organisation's workforce.

	Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Impact/ Risk/ Opportunity	IRO type	[S] Current and anticipated impacts / [D] Actions taken
ESRS S3	Affected communities	**Specific disclosure**		**Social engagement**, including social and charitable activities. **Impact on people or the environment:** 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 non-governmental organisations.	**Own operations, downstream**	Impact	Positive, actual/ -	[S] Building a positive image of the Comarch Group as a socially responsible organisation, strengthening relationships with local communities, increasing brand recognition and fostering employees' motivation and pride in belonging to the organisation. [D] Sponsoring local initiatives, youth sport, and cultural and educational events.
ESRS G1	Business conduct	**Corporate culture**		**Corporate governance** plays a key role in shaping the Comarch Group's operations, influencing both internal organisational processes and its external impact. The Comarch Group aims to shape its management practices based on an operating model that supports decision-making in line with high ethical standards and the principles of sustainable development. **Impact on people or the environment:** Transparent and ethical management reduces the risks of misconduct, discrimination or unethical practices, fostering a culture of compliance and accountability. Effective corporate governance promotes long-term decision-making that takes environmental and social aspects into account, which supports the achievement of ESG objectives and minimises the organisation's negative impact on its surroundings.	**Own operations**	Impact	**Positive, actual/ -**	[S] Enhancing the transparency of decision-making processes, building stakeholder trust, mitigating the risks associated with irregularities and unethical practices, supporting the organisation's long-term stability, and improving its reputation on the domestic and international markets. [D] Adopting and applying the Code of Ethics within the Comarch Group, and implementing and maintaining the Integrated Management System.

	Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Impact/ Risk/ Opportunity	IRO type	[S] Current and anticipated impacts / [D] Actions taken
		Protection of whistleblowers		The Comarch Group has **implemented a system for the anonymous reporting** of irregularities and mechanisms to protect whistleblowers, available to all its own employees. This system was developed and launched in advance, even before the relevant legal regulations came into force. **Impact on people or the environment:** The anonymous whistleblowing system enhances employee safety, fosters an ethical culture and reduces the risk of misconduct, bullying or discrimination, thereby strengthening trust and transparency within the organisation.	**Own operations**	Impact	**Positive, actual/ -**	[S] Early detection of potential breaches, reduction of legal and reputational risks, fostering an ethical culture within the organisation, and increasing staff confidence in internal compliance management mechanisms. [D] Implementation of anonymous whistleblowing mechanisms, operating independently and in accordance with the principles of security and protection for whistleblowers.
		Management of relationships with suppliers including payment practices		The Comarch Group has **a sustainable development policy for suppliers**, as well as a supplier assessment procedure. **Impact on people or the environment:** Mitigating social and environmental risks in the supply chain. This has a positive impact on working conditions, respect for human rights and the reduction of suppliers' negative environmental impact, whilst supporting responsible and ethical business practices.	**Own operations, Upstream**	Impact	**Positive, actual/ -**	[S] Mitigating risks associated with social and environmental non-compliance within 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. [D] The Comarch Group carries out a supplier assessment process to ensure compliance with sustainability criteria, including environmental, social and ethical aspects. Suppliers are required to comply with the provisions of and the Supplier Code of Conduct.
		Corruption and bribery	**Prevention and detection, including training**	Comarch combats corruption through rigorous regulations set out in its Anti-Corruption Policy and detailed	**Own operations**	Impact	**Positive, actual/ -**	[S] Increasing stakeholder trust and minimising legal and reputational risks, thereby supporting the long-term stability

	Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Impact/ Risk/ Opportunity	IRO type	[S] Current and anticipated impacts / [D] Actions taken
			Incidents	guidelines in this area, as well as through its Code of Ethics and compliance procedures. **Impact on people or the environment:** Combating corruption strengthens a culture of integrity, responsibility and trust in both internal and external relations. It increases the transparency of the organisation's activities, reduces the risk of misconduct and promotes the equal treatment of business partners, which translates into operational stability and a positive market image.				and credibility of the Comarch Group. [D] Implementation of the Anti-Corruption Policy and the Code of Ethics; training for staff on business ethics and anti-corruption; mechanisms for the anonymous reporting of breaches.
	Specific disclosures	**Cyber security and data protection**	**Specific disclosures**	Ensuring adequate cybersecurity and the protection of personal data. **Impact on people or the environment:** Ensuring an appropriate level of cybersecurity and personal data protection safeguards the rights and privacy of employees, customers and business partners, minimises the risk of breaches, data leaks and cyberattacks, and enhances trust in the organisation and its services	**Own operations, downstream**	Impact	**Positive, Potential/ short-, medium- and long-term**	[S] Strengthening the trust of customers and business partners and supporting the Comarch Group's reputation as a responsible organisation that complies with legal regulations. [D] An Information Security Management System compliant with ISO 27001 and a Business Continuity Management System compliant with ISO 22301 have been implemented, along with personal data protection policies and regular staff training on cybersecurity and the processing of personal data.
				Cybersecurity and personal data protection – data breaches.	**Own operations, downstream**	Risk	- / short-, medium- and long-term	[S] The consequences of a data breach include an infringement of the privacy of data subjects, the risk of financial loss, a decline in the trust of customers and business partners, as well as potential legal and reputational sanctions for the organisation. Depending on the scale of the incident, a breach may also disrupt operational continuity and affect the company's competitive position.

	Topic	Sub-topic	Sub-sub-topics	Description of impact / Impact on people or environment	Place of impact in the value chain	Impact/ Risk/ Opportunity	IRO type	[S] Current and anticipated impacts / [D] Actions taken
								[D] Security is ensured by an Integrated Management System compliant with ISO/IEC 27001 and ISO 22301, supported by a Security Policy and technical guidelines, which are subject to regular reviews and audits, ensuring the highest level of information protection, including personal data

Individual resilience and risk and opportunity management

As a global provider of IT services and solutions, the Comarch Group conducts business operations that, in terms of its own activities, are characterised by a low carbon footprint compared to high-emission sectors such as heavy industry or the energy sector. The Comarch Group's core operations focus on the provision of digital services, software development and data management, which minimises direct dependence on processes that emit significant amounts of CO_2. Thanks to this specific nature of its operations, Comarch's business model has a strong foundation for building resilience to the direct effects of climate change, whilst simultaneously implementing optimisation measures across the entire value chain.

This resilience was confirmed by a scenario analysis that took into account various IPCC and IEA climate scenarios, as well as TCFD recommendations, and assessed the impact of climate change on operational activities and the functioning of data centres. The resilience analysis was carried out in 2024 and covered the Group's own operations, including sites belonging to the Comarch Group and all significant data centres.

The Comarch Group has a defined ESG Strategy, which includes targets for sustainable development and the reduction of greenhouse gas emissions. In the near future, the Comarch Group plans to align its emission reduction targets with the Science Based Targets initiative (SBTi), which it joined in September 2024. These measures aim to minimise the environmental impact of its operations and increase transparency regarding climate change mitigation efforts.

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

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

As a global organisation, Comarch has implemented a process for analysing risks and opportunities, which also covers threats related to climate change – both physical and regulatory. The Comarch Group actively monitors changes in environmental legislation and adapts its operational processes to comply with applicable legal requirements. This proactive approach reduces financial and reputational risks, thereby strengthening the resilience of the business model.

In the context of risks associated with climate change and ensuring business continuity, Comarch employs comprehensive security solutions for its data centres.

The Comarch Group has implemented procedures and solutions designed to ensure business continuity, including:

- Business Continuity Plan (BCP),
- Disaster Recovery solutions,
- Distribution of office and data centre locations,
- Periodic audits of the solutions in place.

The Comarch Group ensures high operational resilience and business continuity by implementing infrastructure safeguards in data centres, such as system redundancy and data replication – tailored to the specific nature of projects and client requirements. Regular testing and risk monitoring enable the ongoing improvement of contingency systems.

Comarch has implemented a Business Continuity Management System based on the requirements of the ISO 22301 standard. Currently, the scope of certification covers the e-invoicing sector, whilst there are plans to extend the certificate to include further areas. The scope of the certificate covers the design and development, production, consultancy, distribution, implementation, training, maintenance and servicing of a platform intended for the electronic exchange of documents, based on services provided by the Comarch Data Centre (CDC) – the Primary Data Centre and the Disaster Recovery Centre.

The leased data centres meet reliability and security standards, 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 cuts caused by extreme weather events. The procedures in place, data replication and redundant systems significantly enhance operational resilience. Regular tests, internal and external audits, as well as risk monitoring, are key to the further improvement of business continuity systems.

In the context of the long-term resilience of the business model, ownership stability is also of key importance. In 2025, CVC Capital Partners acquired Comarch S.A. The new owner provides access to expert knowledge and the know-how available within CVC Capital Partners, as well as access to professional external advisers, including in the area of long-term strategy development – particularly regarding sustainable development – which enables more effective management of transitional risks and liability risks. Thanks to the support of CVC Capital Partners, 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 associated with climate transition 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

IRO1

Material impacts, risks and opportunities were identified on the basis of a dual materiality analysis. This process, aligned with the requirements of the CSRD, was carried out for the first time in 2024, and was reviewed and updated in 2025. Compared with the previous reporting period, the materiality assessment methodology has been expanded and refined. In particular, the scenario analysis in the area of climate change has been expanded through the integration of models developed by the IPCC, the IEA and the NGFS. Furthermore, the identified opportunities were assigned appropriate categories in accordance with the Company's risk map, and their assessment was carried out on the basis of the criteria and thresholds applied under the current risk management system.

The latest review and update of the double materiality analysis process were completed and approved in May 2026.

Subsequent periodic reviews and updates of the materiality assessment will be carried out annually to ensure that the identified impacts, risks and opportunities remain up to date and are consistent with the changing regulatory, market and operational environment. The next review of the materiality assessment is scheduled for the end of 2026 and the beginning of 2027.

The dual materiality assessment process comprised the following stages:

1. Defining the organisation's business sectors and geographical scope, and identifying the value chain,
2. A questionnaire survey conducted amongst representatives of the Management Board of Comarch S.A. and the ESG Committee to identify key stakeholders,
3. Identification of potential impacts, risks and opportunities – creation of a list of topics for further detailed assessment,
4. Assessment of the materiality of impacts, risks and opportunities (materiality of impact and financial materiality),
5. A questionnaire survey conducted amongst material 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 significant impacts was carried out taking into account the specific nature of the IT sector and the geographical areas in which Comarch Group companies operate. During the materiality assessment process, all sustainability issues listed in the thematic ESRS, in accordance with the list set out in Article 16 of Appendix A to ESRS 1, were analysed in relation to both the organisation's own operations and its business relationships. A survey was conducted amongst selected stakeholder groups on whom the entity has an impact and who have an impact on the entity.

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

- contextual information, i.e. the identification of sectors of activity, the organisation's geographical scope and the identification of the value chain,
- surveys of stakeholders,
- the results of benchmarking analyses and academic studies.

For each issue, aspects related to sustainable development were examined, taking into account four key parameters of impact significance, namely: scale, scope, likelihood and remediability of the impact.

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

Financial materiality

Financial materiality involved identifying potential risks and opportunities. The process of assessing financial materiality began with identifying actual and potential impacts on people and the environment. On this basis, the associated risks and opportunities were determined.

Each identified risk and opportunity was then linked to the corresponding items in the Comarch Group's risk and opportunity map.

For each identified risk or opportunity, the relevant categories from the risk map were assigned, and their assessment was determined on the basis of the values adopted in this risk management system, taking into account the highest level of significance assigned to the area in question.

The process was further supplemented by an expert analysis aimed at verifying the appropriateness of the allocation and taking into account the specific nature of ESG risks and opportunities. As part of this analysis, cases were also reviewed where identified ESG risks were not directly reflected in the existing risk map – in such situations, a justification was prepared for their exclusion from the map or the potential need to expand it was highlighted.

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

- contextual information, i.e. the identification of business sectors, the organisation's geographical scope and the value chain,
- stakeholder surveys,
- information on identified impacts,
- the results of benchmarking analyses and academic studies.

Financial materiality was determined on the basis of an analysis of risks and opportunities, with an assessment carried out across two dimensions: probability of occurrence and potential financial impact. For each of these parameters, the Comarch Group assigned a rating on a scale of 1 to 5.

Double materiality principle

Any sustainability issue associated with a material impact, material risk or material opportunity was considered material from the perspective of the dual materiality principle, and therefore subject to reporting in accordance with the relevant standards and disclosure requirements.

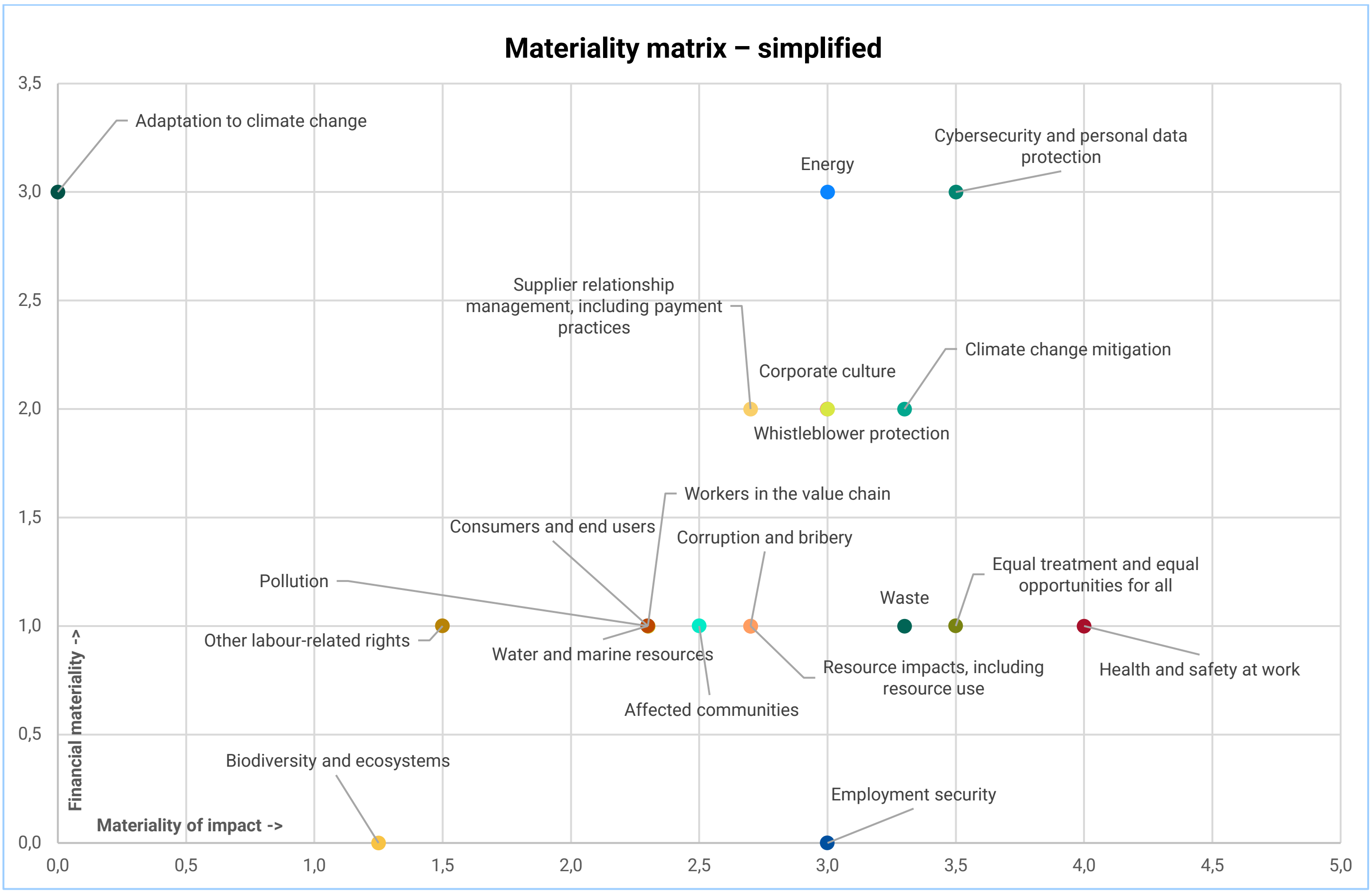
Stakeholder views and benchmarking

In order to gain a comprehensive understanding of the impact of the Comarch Group's operations on key areas relevant to non-financial reporting and sustainable development, a survey was conducted. The aim of the survey was to gather the views and assessments of internal and external stakeholders to enable the identification of key ESG issues relevant to the Comarch Group. As part of the survey, detailed analyses were carried out amongst members of the ESG Committee and representatives of the HR s Department, who – as specialists in their respective fields – provided valuable information on the impact of the Comarch Group's operations. The survey was supplemented by less extensive questionnaires addressed to a broad 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 companies in the IT sector was carried out, with the aim of identifying and assessing the key aspects of sustainable development affecting the operations of the companies under review. This comparative analysis provided key input data for identifying the Comarch Group's actual and potential impacts, risks and opportunities, which form the basis for the subsequent materiality assessment process in accordance with the ESRS – EFRAG IG 1 implementation guidelines.

Results of the Comarch Group's materiality assessment

As a result of the assessment, the Comarch Group developed a materiality matrix, which enabled the identification of material topics.



Issues were deemed material if they received a score of at least 2.5 in the impact analysis, or if their risk or opportunity value was equal to or greater than 2.

The materiality assessment process identified:

- 7 key stakeholder groups,
- 20 material impacts,
- 5 material risks and 4 material opportunities.

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

The material risks and opportunities identified during the dual materiality analysis process are subject to further 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 assessment have set out the strategic directions for the Comarch Group's future actions, enabling it to focus on the areas of greatest significance from the perspective of the organisation and its stakeholders. The decision-making process for identifying material impacts, risks and opportunities, as well as for monitoring them, has been fully integrated into the existing risk management system and is subject to approval by the Management Board of the parent company.

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

E1.IRO-1

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

The aim of the analysis was to comprehensively identify both the threats arising from climate change – including physical risks and risks associated with the energy and regulatory transitions – as well as the development opportunities presented by the global shift towards a low-carbon economy.

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

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

The analysis covered various business segments, including:

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

The analysis takes into account 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 the Group's own activities and its links throughout the value chain, with particular emphasis on energy consumption in data centres, the operation of office buildings, staff transport, business travel and external services. The impact assessment was carried out with regard to total greenhouse gas emissions and their potential impact on climate change. The results of this assessment, including the calculation methodology, data sources and classification of emissions in accordance with the GHG Protocol, are presented in detail in the disclosures contained in section ESRS E1-6.

This analysis utilised greenhouse gas emission scenarios developed by the Intergovernmental Panel on Climate Change (IPCC), such as RCPs (Representative Concentration Pathways), which form the basis for predicting future climate change.

The following greenhouse gas emission scenarios were applied:

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

RCP 4.5: An 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: A high-emission scenario, illustrating the absence of effective decarbonisation measures.

Including the IEA (International Energy Agency) scenarios and access to electricity in the analysis for Comarch provides the appropriate context, particularly as the Comarch Group, which specialises in technology and software, is heavily reliant on reliable and sustainable energy.

The following scenarios were applied:

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

Stable Policies Scenario (STEPS): Based on policies currently being implemented or announced, resulting in moderate progress in terms of energy access and emissions reductions.

Sustainable Development Scenario (SDS): A more sustainable pathway, combining sustainable access to energy with climate targets.

This analysis also applied the TCFD's recommendations on scenario 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 has enabled a comprehensive understanding of the potential impacts of climate change on the organisation's operations and the identification of the strategic actions necessary to manage these challenges.

Short term (up to 2030): Focus on current climate policies, the implementation of short-term measures and their impact on operational activities.

Medium term (2030–2050): Taking into account the transformation of the energy sector and long-term investment decisions.

Long term (up to 2080): Assessment of the consequences of achieving the Paris Agreement targets and their impact on global economic and environmental systems.

The integration of IPCC and IEA scenarios provides a coherent picture of climate and transition risks. The emission levels specified 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-emission pathway (IPCC RCP 2.6) combined with the IEA's NZE, a rapid transition to renewable energy sources and full electrification of operations is assumed. This scenario involves high adaptation costs and transitional risks, but minimises the physical impacts associated with climate change.

Under the moderate-emission scenario (IPCC RCP 4.5), combined with the IEA SDS, a partial shift away from fossil fuels towards renewable energy sources is anticipated. The transitional risks here are moderate, as are the physical impacts.

In contrast, in the high-emission scenario (IPCC RCP 8.5) combined with the IEA STEPS, fossil fuels dominate and emission reductions are minimal. This pathway results in significant physical and reputational risks, which could seriously affect the stability of business operations.

To supplement the physical (IPCC) and energy (IEA) analyses with financial and macroeconomic dimensions, models developed by the Network for Greening the Financial System (NGFS) were used. This is a standard recognised by central banks and financial supervisory authorities, enabling the estimation of so-called transition risks and the impact of climate change on economic indicators.

To ensure methodological consistency, the following scenario mapping was adopted:

- **Ambitious Transition Scenario (Net Zero 2050):** This corresponds to the **IPCC's RCP 2.6** and **the IEA's NZE** pathways. It assumes immediate and rigorous policy action to limit global warming to 1.5°C. In this scenario, physical risks are minimal, whilst transition risks (regulatory costs, emission prices) reach their highest level.
- **Delayed/Moderate Transition Scenario (NDCs):** Corresponds to the **IPCC RCP 4.5** and **IEA SDS** pathways. It assumes the implementation of the climate targets announced by countries. It represents a 'middle ground', with moderate physical risks and rising, though not drastic, transition costs.
- **Current Policies Scenario:** This corresponds to the **IPCC RCP 8.5** and **IEA STEPS** pathways. It assumes no new climate regulations ('business as usual'). In this scenario, transitional risks are low (no costly regulations), but the physical and macroeconomic risks arising from natural disasters are extremely high.

<u>Results of the analysis</u>

The scenario analysis has shown that the key threat associated with climate change is the rising cost of energy, which will directly affect the operation of data centres, as well as potential power outages.

Global warming is driving up the demand for energy to cool IT infrastructure, which, combined with rising electricity prices, will lead to higher operating costs. Companies in the IT sector, including the Comarch Group, will have to implement increasingly advanced energy-saving technologies and optimise their solutions to minimise the negative economic effects resulting from climate change.

Climate change may increase the risk of power cuts, amongst other things, through extreme temperatures, which cause an increase in energy demand – for example, for air conditioning – which may lead to grid overloads and failures, as well as through extreme weather events such as hurricanes, storms, floods and fires, which can damage energy infrastructure.

Furthermore, growing regulatory pressure relating to ESG issues and the potential introduction of carbon taxes in various jurisdictions will place an additional burden on operations in terms of extra costs, forcing investment in renewable energy sources and the decarbonisation of operational processes. The climate scenarios applied are consistent with the assumptions of the financial statements and do not affect the going concern or the valuation of assets within the adopted time horizon. These scenarios constitute an extension of the assessment of risks and opportunities, supporting long-term strategic planning.

The Comarch Group has not identified any activities that are permanently inconsistent with the objectives of a climate-neutral economy. The expansion of IT infrastructure, including data centres, may lead to an increase in the energy costs of powering data centres, including through the purchase of green energy. Expenditure of this nature is taken into account in strategic planning; however, as at the date of this report, it does not have a material impact on the figures presented in the financial statements.

The key financial implications identified in the analysis are:

- **An increase in operating costs** – in particular, an increase in the cost of energy required to cool data centres,
- **Financial burdens arising from regulation** – including carbon taxes and new ESG requirements,
- **The need for investment** – in energy-efficient technologies, renewable energy sources and infrastructure modernisation,
- **Potential financial losses** – resulting from extreme weather events, operational disruptions and contractual losses,
- **Reputational and legal risks** – associated with failure to comply with the changing requirements of stakeholders and regulators,
- **Long-term reduction in operating costs** – through investment in energy-efficient technologies and the expansion of data centres in locations with lower energy costs,
- **Increased competitiveness** – through the development of IT products and services that support sustainable development and the acquisition of customers seeking eco-friendly solutions.

The Comarch Group has defined the following issues as immaterial:

Pollution – E2

E2.IRO-1

The Comarch Group has conducted a review of its own sites and business activities to identify the impacts, risks and opportunities associated with the pollution of air, water and soil by microplastics and potentially hazardous substances. Given the nature of its operations, which are primarily based on the provision of IT services, software development and the management of ICT infrastructure, the Comarch Group's activities do not involve the emission of significant quantities of harmful substances into the environment. The Comarch Group does not carry out any industrial or manufacturing processes that would generate significant pollution. The consumption of consumables, noise emissions, the use of chemicals and the generation of hazardous waste remain at a marginal level.

No significant pollution-related risks have been identified in relation to the value chain. Potential impacts associated with the collection and management of end-of-life electronic equipment have been assessed as immaterial on the basis of the analysis carried out and a comparative analysis of market practices. Issues relating to electronic waste are addressed under the ESRS E5 standard.

No significant dependencies on ecosystem services were identified either. The review was based on data from the environmental management system (ISO 14001) and an analysis of impacts along the value chain. As there were no impacts on local communities, the Comarch Group did not conduct any dedicated consultations in this regard.

Water and marine resources – E3

E3.IRO-1

The Comarch Group has carried out a review of its own resources, operational activities and the services it provides. In line with its business profile, the Comarch Group does not engage in activities relating 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 Comarch Group's activities means that its impact on water resources is insignificant from an environmental impact perspective. Water consumption within the Comarch Group stems mainly from the day-to-day needs of staff in offices and, to a marginal extent, from the cooling of data centres. In the case of one subsidiary, which remained part of the Comarch Group until August 2025, water consumption was additionally linked to the operation of recreational facilities – water was used to fill a swimming pool, create an ice rink and irrigate a sports pitch. The water used by the Comarch Group comes exclusively from external suppliers and is sourced from mains water networks, which minimises the Comarch Group's impact on natural water resources. Water consumption is monitored; its scale is limited and has no significant environmental or financial impact in the context of the Comarch Group's operational activities. As part of the value chain analysis, it was identified that the most water-intensive indirect process is the production of semiconductors and IT equipment by external suppliers. It should be emphasised that the Comarch Group procures hardware infrastructure primarily for its own operations (including to equip its own data centres and workstations), whilst the resale of third-party equipment accounts for a negligible share of the Comarch Group's revenue structure. Given that the Comarch Group is primarily a purchaser of ready-made, certified equipment and does not exercise direct operational control over the production processes of suppliers located further down the value chain, this impact has been assessed as immaterial from the perspective of the Comarch Group's financial and environmental risks. In the downstream sector (the use of systems by customers), no processes generating significant consumption or pollution of water resources have been identified.

As there were no impacts on local communities, the Comarch Group did not conduct any dedicated consultations in this regard.

Biodiversity – E4

E4.IRO-1

The Comarch Group conducted a review of its own sites and value chain to identify actual and potential impacts, dependencies, risks and opportunities relating to biodiversity and ecosystems. The analysis took into account criteria such as site location, the nature of operations and the level of control over operations within the value chain. The Comarch Group does not engage in any business activities that have a significant impact on biodiversity. Indirect impacts, related, amongst other things, to the use of raw materials in computer hardware, are limited and concern areas beyond the Comarch Group's direct control, within the third and fourth tiers of the value chain.

The sector analysis carried out indicates that the measures taken by suppliers to protect biodiversity focus mainly on managing environmental risks, reducing the environmental impact of their operations and complying with regulatory requirements. The identified impacts occur primarily at later stages of the supply chain and have not been deemed significant from the perspective of the Comarch Group's operations.

In the course of its own operations, the Comarch Group does not exhibit any significant operational dependencies on ecosystems or their services. The Comarch Group has not identified any systemic, transitional or physical risks related to biodiversity.

Given the absence of operational sites near environmentally sensitive areas and the lack of significant impacts on ecosystem services, the Comarch Group has not consulted with affected communities.

Description of the 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 significant impacts, risks and opportunities related to resource use and circular economy issues as part of a double materiality analysis. As part of the review of the Comarch Group's operations, the resources introduced into its operations were identified, and the quantity, types and methods of handling the waste generated – including end-of-life electronic equipment – were determined.

A value chain analysis was also carried out, identifying minerals – including conflict minerals and rare earth elements – used in equipment essential to the Comarch Group's operations, such as computers and servers. The assessment of potential risks and opportunities covered, amongst other things, factors such as: the availability of critical raw materials, the feasibility of implementing circular economy principles, 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 its double materiality analysis.

As part of the process of identifying and assessing material impacts, risks and opportunities in the area of corporate governance, Comarch S.A. took into account the experience and requirements arising from the company's presence on the regulated market until 26 March 2025. The Comarch Group has taken into account the heightened expectations of a wide range of stakeholders regarding the quality of governance processes and the transparency of disclosed information.

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

IRO-2

Following a double materiality analysis, carried out in accordance with the criteria and materiality thresholds described in disclosure IRO-1, the Group identified material impacts, risks and opportunities, as well as the corresponding ESRS disclosure requirements. A summary of material disclosures, together with references to the relevant ESRS clauses and their locations within the Report, is set out in the table below.

Disclosure requirement	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 incentiveschemes	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 relating 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 relating to climate change mitigation and adaptation	6.5
ESRS E1-5	Energy consumption and energy 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 the 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
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 workforce		
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 workforce and workers' representatives about impacts	8.3
ESRS S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	8.4
ESRS S1-4	Taking action on material impacts on own workforce, and approaches to managing 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-employees 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	Remuneration metrics (pay gap and total remuneration)	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 on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	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
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	Incidents of corruption or bribery	10.4
ESRS G1-6	Payment practices	10.5
Personal data and cybersecurity (specific disclosure)		
G2-SBM3	Material impacts, risks and opportunities relating to personal data and cybersecurity.	11.1
G2-1	Policies related to the personal data and cyber security	11.2
G2-2	Taking action on 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 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 I		,Annex II to Commission Delegated Regulation (EU) 2020/181627		2.1
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21(e)			Annex II to Delegated Regulation (EU) 2020/181		2.1
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex I				2.4
ESRS 2 SBM-1 Participation in fossil fuel activities paragraph 40(d)(i)	Indicator No 4 in Table #1 of Annex I	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative	Annex II to Delegated Regulation (EU) 2020/1816		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)
		information on Environmental risk and Table 2: Qualitative information on social risk			
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex I		Annex II to 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 Delegated Regulation (EU) 2020/1816		Irrelevant
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 to 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	Article 12(1)(d) to (g) and Article 12(2) of Delegated Regulation (EU) 2020/1818		Irrelevant
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex I	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Article 6 of Delegated Regulation (EU) 2020/1818		6.5
ESRS E1-5 Energy consumption from fossil sources disaggregated by	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex I				6.6

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Reference to regulations on indicators reference	EU Climate Law reference	Place in report (chapter)
sources (only high climate impact sectors) paragraph 38					
ESRS E1-5 Energy consumption and energy mix paragraph 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	Indicator number 6 Table #1 of Annex I				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 I	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	Article 5(1), Article 6 and Article 8(1) of Delegated Regulation (EU) 2020/1818		6.7
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex I	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Article 8(1) of Delegated Regulation (EU) 2020/1818		6.7
ESRS E1-7 GHG removals and carbon credits paragraph 56				Article 2(1) of Regulation (EU) 2021/1119	6.8
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Annex II to Delegated Regulation (EU) 2020/1818		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:			6.10

Disclosure Requirement and related datapoint	SFDR reference	Pillar 3 reference	Reference to regulations on indicators reference	EU Climate Law reference	Place in report (chapter)
		Exposures subject to physical risk			
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			Annex II to Delegated Regulation (EU) 2020/1818		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 in Table #1 of Annex I, Indicator number 2 in Table #2 of Annex I, Indicator number 1 in Table #2 of Annex I and Indicator number 3 in Table #2 of Annex I				Irrelevant
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex I				Irrelevant
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table #2 of Annex I				Irrelevant
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex I				Irrelevant
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex I				Irrelevant
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1 in Table #2 of Annex I				Irrelevant
ESRS 2 SBM 3-E4, paragraph 16(a)(i)	Indicator number 7 in Table #1 of Annex I				Irrelevant
ESRS 2 SBM 3-E4, paragraph 16(b)	Indicator number 10 in Table #2 of Annex I				Irrelevant
ESRS 2 SBM 3-E4, paragraph 16(c)	Indicator number 14 in Table #2 of Annex I				Irrelevant
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 in Table #2 of Annex I				Irrelevant
ESRS E4-2 Sustainable Ocean/sea practices or policies paragraph 24(c)	Indicator number 12 in Table #2 of Annex I				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 E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 in Table #2 of Annex I				Irrelevant
ESRS E5-5 Non-recycled waste, point 37(d)	Indicator number 13 in Table #2 of Annex I				7.5
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 9 in Table #1 of Annex I				7.5
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 in Table #3 of Annex I				8.1
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator No 12 in Table #3 of Annex I				8.1
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 in Table #3 and Indicator number 11 in 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			Annex II to Delegated Regulation (EU) 2020/1816		8.2
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 in Table #3 of Annex I				8.2
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				8.2
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		Annex II to Delegated Regulation (EU) 2020/1816		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		Annex II to Delegated Regulation (EU) 2020/1816		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

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 S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator number 14 Table #3 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		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 I				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 I		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		Irrelevant
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Annex II to Delegated Regulation (EU) 2020/1816		Irrelevant
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 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 I				9.2
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 I		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		9.2
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex I				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 I				Irrelevant
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD	Indicator number 10 Table #1 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816, Article		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)
guidelines paragraph 17			12(1) of Delegated Regulation (EU) 2020/1818		
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex I				Irrelevant
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex I				10.1
ESRS G1-1 Protection of whistleblowers, paragraph 10(d)	Indicator number 6 Table #3 of Annex I				10.1
ESRS G1-4 Fines for violation of anti-corruption and antibribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex I		Annex II to Delegated Regulation (EU) 2020/1816		10.3
ESRS G1-4 Standards of anticorruption and antibribery paragraph 24 (b)	Indicator No 16 in Table 3 of Annex I				10.3

Environment

5. EU Taxonomy

Taxonomy is the informal name for the European Union legislation that sets out 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 the establishment of a framework to facilitate sustainable investment, which imposes an obligation to disclose whether and to what extent a company's activities are consistent with the principles of the EU Taxonomy.

The disclosures relating to the EU Taxonomy for the Comarch Group have been prepared on the basis of the EU Taxonomy Regulation issued by the European Commission and a series of implementing acts applicable to the 2025 reporting year. With a view to enhancing the transparency and clarity of the data presented, the Comarch Group has decided to make use of the procedural simplifications introduced by Commission Delegated Regulation (EU) 2026/73 of 4 July 2025. Consequently, these disclosures for the financial year 2025 have been prepared using the new, simplified reporting templates. Furthermore, the Comarch Group has applied the materiality criterion provided for in the regulations, taking into account a 10% threshold in relation to the denominators of key performance indicators (KPIs) for turnover, capital expenditure (CapEx) and operating expenditure (OpEx).

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

The process of identifying activities eligible for the EU Taxonomy involved reviewing all activities carried out by Comarch S.A. and the subsidiaries of the Comarch Group in relation to the environmental objectives set out in the Taxonomy. The identification of activities was carried out in three areas: revenue generated from sales, capital expenditure incurred and operating expenditure incurred. The following were involved in the process of identifying activities eligible under the EU Taxonomy and assessing their compliance with the Technical Qualification Criteria: management, business area experts, the controlling department, and those responsible for ESG matters.

In accordance with the provisions of Commission Delegated Regulation (EU) 2026/73 of 4 July 2025, if the total amount associated with a given type of economic activity of a non-financial undertaking represents less than 10% of the denominator of the relevant KPI, that entity may omit the assessment of the eligibility and compliance of that activity with the EU Taxonomy. In order to verify the materiality thresholds, the Comarch Group reviewed its operational structure at a consolidated level.

As a result of the assessment carried out, the Comarch Group identified the following area as a material activity (qualifying under the EU Taxonomy and simultaneously exceeding the 10% materiality threshold under the turnover KPI):

- CCM "8.1. Data processing, website management (hosting) and similar activities", comprising revenue generated from the provision of services under the cloud model, i.e.: Software as a Service (SaaS), Platform as a Service (PaaS) and Infrastructure as a Service (IaaS).

Conversely, revenue from CE activity "4.1 Provision of data-driven IT/OT solutions" in the context of the Circular Economy (GOZ), comprising revenue generated from the sale of Comarch OSS products, did not exceed the materiality threshold . Consequently, the compliance assessment stage regarding the criteria of significant contribution and DNSH was omitted for this activity.

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

At a consolidated level, in the context of capital expenditure (CapEx) eligible under the EU Taxonomy, the Comarch Group has identified the following activity as significant and exceeding the 10% materiality threshold:

- CCM "8.1. Data processing, website hosting and similar activities" – capital expenditure directly related to the expansion and modernisation of data centre infrastructure. As this exceeds the materiality threshold, this expenditure has been subject to an assessment of compliance with the technical eligibility criteria.

At the same time, the Comarch Group has identified the following activities that qualify for the EU Taxonomy from a CAPEX perspective and do not generate revenue:

- "6.5. Transport by motorcycles, passenger cars and light commercial vehicles" – The purchase of vehicles for the Comarch fleet,
- "7.2. Renovation of existing buildings" – Expenditure related to the modernisation of office buildings in Kraków,
- "7.3. Installation, maintenance and repair of energy-efficiency equipment" – Replacement of lighting with energy-efficient LED solutions,
- "7.6. Installation, maintenance and repair of renewable energy systems" – Expenditure related to the installation of photovoltaic panels on one of the office buildings.

As the 10% materiality threshold was not exceeded for the above-mentioned capital expenditure, the stage of verifying their compliance with the criteria for a significant contribution and the DNSH criteria was omitted.

At the consolidated level, in the context of operating expenditure (OpEx) eligible under the EU Taxonomy, the Comarch Group has identified the following activity as significant and exceeding the 10% materiality threshold:

- "8.1. Data processing, website management (hosting) and similar activities" – non-capitalisable operating expenses directly related to the ongoing technical maintenance, servicing and ensuring the operational continuity of data centre infrastructure. As the materiality threshold was exceeded, these costs were subject to an assessment of compliance with the technical eligibility criteria.

Verification of compliance with the Technical Eligibility Criteria

The Comarch Group carried out a verification of compliance with the Technical Eligibility Criteria for activities falling under the classification, i.e. "8.1. Data processing, website management (hosting) and similar activities", at a consolidated level. The verification carried out revealed that the aforementioned activities did not comply with certain Technical Eligibility Criteria, namely: the lack of verification by an independent third party of the implementation of the recommended practices set out in the European Code of Conduct on the Energy Efficiency of Data Centres, as well as failure to meet the criterion regarding the global warming potential of refrigerants used in air-conditioning systems in data centres. The vast majority of the refrigerants used have GWP values exceeding the limits specified in the EU Taxonomy. Comarch will take steps to meet the Technical Eligibility Criteria over the coming years.

The Comarch Group has not carried out a verification of compliance with the Technical Qualification Criteria for activities falling within the taxonomy, i.e. 4.1. 'Provision of data-driven IT/OT solutions', as the 10% materiality threshold for this activity has not been exceeded.

The significant capital expenditure (CapEx) identified was deemed non-compliant with the EU Taxonomy framework due to failure to meet the Technical Qualification Criteria for the activity '8.1. Data processing, website hosting and similar activities'.

The Comarch Group did not carry out a verification of compliance with the Technical Qualification Criteria for the following types of activity:

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

as the 10% materiality threshold for these capital expenditure items was not exceeded.

The significant operating expenditure (OpEx) identified was deemed non-compliant with the EU Taxonomy framework as it did not meet the Technical Eligibility Criteria for activity '8.1. Data processing, website hosting and similar activities'.

Verification of compliance with the Minimum Guarantees

Verification of compliance with the Minimum Safeguards, as set out in Article 18 of Regulation 2020/852 of 18 June 2020, was carried out within the Comarch Group in accordance with the recommendations set out in the Final Report on Minimum Safeguards by the Platform on Sustainable Finance and, furthermore, taking into account the 2023 update to the OECD Guidelines for Multinational Enterprises; when assessing compliance with the Minimum Safeguards, the Comarch Group also took into account the area of Science, Technology and Innovation. The Comarch Group meets the requirements of the Minimum Safeguards, i.e. it has in place and applies due diligence measures designed to ensure that its operations are conducted in accordance with the principles and recommendations set out in documents such as the OECD (Organisation for Economic Co-operation and Development) for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight core conventions identified 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.

The Comarch Group has implemented, amongst other things:

- The Code of Ethics applicable to companies within the Comarch Group, available at: https://www.comarch.pl/o-firmie/zrownowazony-biznes/kodeks-etyczny/, in which Comarch undertakes, amongst other things, to:
  - comply with international human rights standards and international labour standards,
  - adhering to the principles of fair competition, and preventing bribery, illegal payments and corruption.
- the Sustainable Development Policy for Suppliers, which sets out the key principles guiding the Group in its cooperation with business partners. Furthermore, this document constitutes a commitment to pursuing a sustainable procurement policy and sets out expectations for key suppliers, including, amongst other things, with regard to respect for human rights.

- The Anti-Corruption Policy, implemented within the Comarch Group, which constitutes a set of applicable rules and standards of conduct aimed at preventing and responding to actions that may constitute corruption.
- The Counterparty Analysis Policy, which sets out the principles, responsibilities and standards for the process of analysing and assessing counterparties, with the aim of:
    - ensuring cooperation with reliable business partners,
    - minimising operational, legal and financial risks,
- A procedure for the screening and assessment of suppliers and subcontractors, enabling the identification and management of risks within the supply chain.
- A whistleblowing system enabling anonymous reports to be made, together with the option of anonymous two-way communication with the person reporting the breach, and procedures governing the rules for reporting breaches.
- A Compliance Policy, which constitutes a set of rules, standards and commitments aimed at ensuring that the activities of the Comarch Group companies comply with applicable law, ethical norms, quality standards and the principles of sustainable development.
- The Comarch Group's HR Policy, which systematises key aspects relating to human resources management within the Group.

No final convictions have been handed down against Comarch S.A. or the companies of the Comarch Group in relation to human rights, corruption, fair competition or taxation.
A review was carried out of the OECD Working Group on Bribery and the Business and Human Rights Resource Centre (BHRRC) databases, which revealed no reports concerning Comarch Group companies during the period covered by the review.

Neither Comarch SA nor any other companies within the Comarch Group are involved in activities relating to nuclear energy or natural gas.

Accounting principles

Key performance indicators were calculated in accordance with the Delegated Act pursuant to Article 8 of the EU Taxonomy on disclosures, taking into account the Group's own processes, existing reporting systems and the assumptions adopted. A materiality threshold of 10% was applied in determining the indicators; consequently, values that are immaterial in 2025 from the perspective of operating expenditure have not been included in the indicators. In particular, for OpEx, the numerator was not calculated for activities 4.1, 6.5, 7.2 and 7.6 due to the absence of material operating expenditure in these categories of activity.

The following principles were applied to calculate the percentage share of turnover, CapEx and OpEx that are eligible for and compliant with the EU Taxonomy:

Turnover

To determine the efficiency ratio, expressed as a percentage of the Comarch Group's turnover that qualifies for and complies with the EU Taxonomy, the following principles were adopted:

- the percentage of turnover qualifying under the EU Taxonomy and compliant with the EU Taxonomy was calculated by dividing:
    - the total revenue identified as qualifying under the EU Taxonomy and compliant with the EU Taxonomy – (all revenue relates to contracts with customers) by the Comarch Group's

consolidated revenue disclosed in the consolidated profit and loss account within the Comarch Group's consolidated financial statements for the period 1 January 2025 to 31 December 2025.

At the consolidated level, the Comarch Group has identified the following activities as material activities that qualify under the EU Taxonomy and simultaneously generate revenue exceeding the 10% materiality threshold:

- "8.1. Data processing, website hosting and similar activities", comprising revenue generated from the provision of services under the cloud model, i.e.: Software as a Service (SaaS), Platform as a Service (PaaS) and Infrastructure as a Service (IaaS).

Capital expenditure (CapEx)

In order to determine the performance indicator in the form of the percentage of the Comarch Group's capital expenditure (CapEx) that qualifies for the EU Taxonomy framework and is consistent with it, the following principles were adopted:

- the percentage of capital expenditure (CapEx) qualifying for the EU Taxonomy framework and compliant with the EU Taxonomy was calculated by dividing:
  - the total capital expenditure identified as qualifying under the EU Taxonomy and compliant with the EU Taxonomy by,
  - the total capital expenditure recognised in the Comarch Group's consolidated financial statements for the period 1 January 2025 to 31 December 2025, *calculated in accordance with the definition in the Taxonomy, under which the total investment comprises an increase in:*
    - intangible assets (acquisition of intangible assets as set out in Note 5.5. Intangible Assets),
    - property, plant and equipment (increases in fixed assets in Note 5.1 Property, Plant and Equipment),
    - right-of-use assets (increases in Note 5.2 'Right-of-use assets' and lease liabilities),
    - investment property (increases in Note 5.3 'Investment property').

Investments relating to the activity *'8.1. Data processing, website hosting and similar activities'*, concerning the expansion of the technical infrastructure of data centres, were recognised as significant capital expenditure qualifying under the EU Taxonomy.

Operating expenditure (OpEx)

In order to determine the performance indicator in the form of operating expenditure (OpEx) eligible under the EU Taxonomy and compliant with it, the following principles were adopted:

- the percentage of operating expenditure (OpEx) eligible under the EU Taxonomy and compliant with the EU Taxonomy was calculated by dividing
  - the total operating expenditure identified as eligible under the EU Taxonomy and compliant with the EU Taxonomy by,
  - the sum of all direct, non-capitalised costs related to:
    - research and development,
    - repairs and refurbishment of buildings,
    - leasing / short-term rental,
    - upkeep, maintenance and repairs,

other direct expenditure related to the day-to-day operation of tangible fixed assets, necessary for the continuous and effective operation of the assets.

Expenditure relating to the activity ‘8.1. Data processing, website hosting and similar activities’, concerning the maintenance of data centre infrastructure in good technical condition, has been recognised as significant operating expenditure eligible under the EU Taxonomy.

Other information

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

The Parent Company exercised direct supervision over the data consolidation process, ensuring that each type of activity was assigned to only one taxonomy activity category. As a result, no part of turnover, CapEx or OpEx was double-counted.

Changes in the levels of performance indicators qualifying for the EU Taxonomy in 2025 compared to 2024 result from two factors:

- Implementation of the 10% materiality threshold: The application of simplifications under Regulation 2026/73 allowed for the exclusion of scattered, immaterial operations. This resulted in a decrease in the eligibility ratio for turnover (from 22% to 16%).
- Concentration of capital expenditure: The increase in the CapEx ratio from 11% to 14% stems directly from the intensification of expenditure on the expansion and modernisation of the technical infrastructure of data centres as part of key activity 8.1.

The share of activities compliant with the EU Taxonomy was not reported in either of the two years analysed. This is due to the failure to meet certain technical criteria for CCM 8.1 activities (relating to the parameters of cooling agents and the lack of external verification of the implementation of the European Code of Conduct), which are scheduled to be progressively addressed in the coming years.

Percentage share of turnover, capital expenditure and operating expenditure attributable to products or services related to economic activities eligible for or compliant with the taxonomy – disclosure relates to 2025 (KPI summary)

Financial year 2025															
Key performance indicator	Total	Proportion of activities falling within the classification	Activities in line with the classification	Proportion of activities in line with the classification	Breakdown by environmental objectives of activities in line with the classification: Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity	Proportion of supporting measures	Proportion of transition measures	Activities not subject to assessment and deemed immaterial	Activities falling within the classification scheme in the previous financial year (N-1)	Proportion of activities in line with the classification in the previous financial year (N-1)
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
	Currency (thousands of PLN)	%	Currency (thousands of PLN)	%	%	%	%	%	%	%	%	%	%	Currency (thousands of PLN)	%
Turnover	1 999 800	16%	-	-	0%	-	-	-	-	-	-	16%	6%	-	-
Capital expenditure	109 945	14%	-	-	0%	-	-	-	-	-	-	14%	9%	-	-
Operating expenses	59 193	11%	-	-	0%	-	-	-	-	-	-	11%	-	-	-

Percentage share of **turnover** from products or services related to business activities falling within or complying with the classification system – disclosure relates to the year 2025 (KPI summary)

Financial year 2025													
Business activity	Code or codes	Key performance indicator for activities falling within the classification (proportion of turnover falling within the classification)	Key performance indicator for activities compliant with the classification (monetary value of turnover)	Key performance indicator for activities in line with the classification (share of turnover in line with the classification)	Environmental objective for activities in line with the classification: Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity	Supporting activities	Transition activities	Share of activities in line with the framework within activities eligible for the framework
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
		%	Currency (thousands of PLN)	%	%	%	%	%	%	%	(supportive where appropriate)	(to facilitate the transition where appropriate)	%
8.1. Data processing, website management (hosting) and similar activities	CCM 8.1	16%	0	0%	0%	0%	0%	0%	0%	0%	**-**	**Y**	**0%**
Total activities in accordance with the classification system, broken down by purpose	-	**-**	0	0%	0%	0%	0%	0%	0%	0%	-	-	-
Total key performance indicator (turnover)	CCM 8.1	16%	0	0%	0%	0%	0%	0%	0%	0%	**-**	**Y**	**0%**

In 2025, the proportion of revenue (turnover) eligible under the EU Taxonomy for the Comarch Group stood at 16%. This activity was classified as non-compliant with the Taxonomy due to its failure to meet the Technical Qualification Criteria for this activity. Information relating to the previous reporting period is presented in accordance with the regulations in force at the time of preparing the 2024 report.

Percentage of the Comarch Group's turnover qualifying under the EU Taxonomy	Comarch Group (thousands of PLN)	
	31 December 2025	31 December 2024
Revenue from eligible activities	327 540	430 277
Consolidated revenue	1 999 800	1 916 871
Ratio of revenue from qualifying activities	16%	22
Percentage of the Comarch Group's turnover compliant with the EU Taxonomy	**31 December 2024**	
	31 December 2025	**31 December 2024**
Revenue from compliant activities	0	0
Consolidated revenue	1 999 800	1 916 871
Ratio of revenue from compliant activities	0%	0%

Percentage share of **capital expenditure** on products or services relating to business activities falling within or complying with the classification system – disclosure relates to the year 2025 (KPI summary)

Financial year 2025													
Business activity	Code or codes	Key performance indicator for activities falling within the classification (proportion of capital expenditure falling within the classification)	Key performance indicator for activities compliant with the classification (monetary value of capital expenditure)	Key performance indicator for activities in line with the classification (capital expenditure in line with the classification)	Environmental objective for activities in line with the classification: Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity	Supporting activities	Transition activities	Proportion of activities in line with the framework within activities eligible for the framework
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
		%	Currency	%	%	%	%	%	%	%	(supportive where appropriate)	(to facilitate the transition where appropriate)	%
8.1. Data processing, website management (hosting) and similar activities	CCM 8.1	14%	0	0%	0%	0%	0%	0%	0%	0%	-	T	0%
Total activities in accordance with the classification system, broken down by purpose	-	-	0	0%	0%	0%	0%	0%	0%	0%	-	-	-
Total key performance indicator (capital expenditure)	CCM 8.1	14%	0	0%	0%	0%	0%	0%	0%	0%	-	T	0%

The percentage of material capital expenditure related to eligible activities in 2025 stands at 14% for the Comarch Group. These investments were deemed inconsistent with the EU Taxonomy framework as they did not meet the Technical Qualification Criteria for activity *'8.1. Data processing, website hosting and similar activities'*.

Percentage of the Comarch Group's capital expenditure (CapEx) eligible under the EU Taxonomy	**Comarch Group (thousands of PLN)**	
	31 December 2025	**31 December 2024**
Capital expenditure relating to eligible activities	**14 961**	**15 091**
Total capital expenditure	**109 945**	**131 943**
Ratio of capital expenditure relating to eligible activities	**14%**	**11**

Percentage of the Comarch Group's capital expenditure (CapEx) compliant with the EU Taxonomy	**Comarch Group (thousands of PLN)**	
	31 December 2025	**31 December 2024**
Capital expenditure related to compliant activities	**0**	**0**
Total capital expenditure	**109 945**	**131 943**
Ratio of capital expenditure relating to compliant activities	**0%**	**0%**

Percentage share of **operating expenditure** on products or services related to business activities eligible for or in line with the classification system – disclosure relates to the year 2025 (KPI summary)

Financial year 2025													
Business activity	Code or codes	Key performance indicator for activities falling within the classification (proportion of operating expenditure falling within the classification)	Key performance indicator for activities in line with the classification (monetary value of operating expenditure)	Key performance indicator for activities in line with the classification (proportion of operating expenditure in line with the classification)	Environmental objective for activities in line with the classification: Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity	Supporting activities	Transition activities	Proportion of activities in line with the framework within activities eligible under the framework
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
		%	Currency	%	%	%	%	%	%	%	(supportive where appropriate)	(to facilitate the transition where appropriate)	%
8.1. Data processing, website management (hosting) and similar activities	CCM 8.1	11%	0	0%	0%	0%	0%	0%	0%	0%	-	T	0%
Total activities in accordance with the classification system, broken down by purpose	-	-	0	0%	0%	0%	0%	0%	0%	0%	-	-	-
Total key performance indicator (operating expenditure)	CCM 8.1	11%	0	0%	0%	0%	0%	0%	0%	0%	-	T	0%

The percentage of material operating expenditure relating to eligible activities in 2025 amounts to 11% for the Comarch Group. The largest share of operating expenditure relating to the maintenance of tangible fixed assets concerns Comarch's office infrastructure, which is not directly linked to Comarch's activities that qualify under the EU Taxonomy. These expenses were deemed non-compliant with the EU Taxonomy framework due to failure to meet the Technical Qualification Criteria for activity ‘8.1. Data processing, website hosting and similar activities’.

Percentage of the Comarch Group’s operating expenses (OPEX) eligible under the EU Taxonomy	Comarch Group (thousands of PLN)	
	31 December 2025	31 December 2024
Operating expenditure related to eligible activities	6 750	8 344
Total operating expenses	59 193	63 243
Ratio of operating expenditure relating to eligible activities	11%	13%
Percentage of the Comarch Group’s operating expenditure (OPEX) in accordance with the EU Taxonomy	Comarch Group (thousands of PLN)	
	31 December 2025	31 December 2024
Operating expenditure related to compliant activities	0	0
Total operating expenses	59 193	63 243
Ratio of operating expenditure relating to compliant activities	0%	0%

6. Climate change

6.1. Transition plan for climate change

E1-1

The Comarch Group does not present a Transition Plan in its 2025 Report. It intends to develop and disclose one in the coming years. The scope of the plan will cover Scope 1 and 2 emissions, as well as material Scope 3 categories over which the Comarch Group exercises control.

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

SBM-3

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

The following were identified as the most significant impacts:

- **Greenhouse gas emissions** generated both through the company’s own operations (including business travel, the operation of heating systems and the running of generator sets) and throughout the value chain, in particular in the production of computer hardware by suppliers and the use of products sold.
- **Electricity consumption**, covering the Group’s own operations (in particular the running of office buildings and the operation and cooling of data centres) and the activities of partners in the supply chain.

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

- **Transformational and regulatory risk** (transition risk) associated with the company’s strategy being out of step with global decarbonisation. This includes the risk of exclusion from tenders due to failure to meet stricter emissions standards for the IT sector, as well as rising and unpredictable energy costs (including through the EU ETS). Consequently, insufficient progress in adapting to the requirements of the circular economy and greenhouse gas reduction leads to a loss of competitive advantage.

- **The risk of rising electricity costs** (transition risk) resulting from increased energy demand for cooling, as well as the decreasing availability of energy resources.
- **The risk of instability and interruptions in electricity supply**, as well as the need to incur additional expenditure associated with securing alternative power sources (physical risk) resulting from extreme weather events caused by climate change, which place a direct strain on energy infrastructure, significantly increasing the risk of grid failures, voltage fluctuations and regional blackouts.

At the same time, the Comarch Group has identified significant opportunities for growth, including:

- **The production and development of software** supporting companies in monitoring, reporting and reducing their carbon footprint, which enables the Comarch Group to adapt its offering to growing customer requirements in the area of sustainable development and ESG reporting.
- **A moderate reduction in operating costs** through increased use of energy from renewable sources (RES), contributing to improved energy efficiency and greater 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 described in detail in Chapter *3.3: Significant impacts, risks and opportunities, and their interrelationships with the strategy and business model.*

6.3. Policies realted to climate change mitigation and adaptation

E1-2

The Comarch Group does not currently have a formally adopted, uniform policy on mitigating the effects of climate change and adapting to its consequences. The development and implementation of such a policy constitute the next stage of the ongoing strategic process and will take place following the finalisation and approval of decarbonisation targets by the SBTi initiative. This will enable the full integration of science-based targets into the framework of the Group's new climate policy. Until this policy is adopted, activities relating to climate change mitigation and adaptation are carried out and coordinated on the basis of the internal documents and existing management systems in force within the Comarch Group.

<u>Assumptions and objectives of the ESG strategy</u>

The aim of the document, published in 2022, is to set out the main directions for action in the areas of ESG and sustainable development for the companies comprising the Comarch Group. The document also outlines the strategic quantitative and qualitative ESG targets that Comarch intends to achieve over the next five years.

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

Progress in implementing this strategy is monitored on an ongoing basis, reported to management and published in the annual sustainability report.

The strategy is a public document, available on Comarch's official website. The full text 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 overarching document of the IMS, which obliges all companies within the Comarch Group to apply the standards set out therein. This policy sets out the organisation's overall aims and objectives regarding quality, environmental protection, health and safety at work, energy management and information security, which are formally expressed by the top management, i.e. the Management Board of the parent company.

The Integrated Management System aims to ensure the proper, systematically managed implementation of all business processes that affect the quality of products and services. The efficient operation of the system ensures that all processes are monitored for effectiveness and efficiency, improved and adapted to constantly changing market and technological conditions, as well as to changing customer requirements.

In the context of climate issues, the Policy addresses climate change mitigation through a commitment to take active measures to reduce negative environmental impacts and improve energy performance, which is implemented in accordance with the certified standards PN-EN ISO 14001:2015-09 and PN-EN ISO 50001:2018-09. The issue of adaptation to climate change has not been explicitly articulated; however, the aspect of resilience to physical risks is supported by the implemented Business Continuity Management System (BCMS) compliant with the PN-EN ISO 22301:2020-04 standard.

Top management – the Management Board of Comarch SA – is responsible for implementing the provisions of the Policy and for providing the necessary resources and funds.

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

- **Impacts**: greenhouse gas emissions, energy consumption, resource consumption in the production of IT equipment, waste, health and safety at work, information security incidents,
- **Risks**: threats arising from climate change (physical and transitional), legal and reputational risks relating to data protection and cyber-attacks,
- **Opportunities**: the development of innovative and secure IT solutions supporting carbon footprint calculations.

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

Implementation of the Integrated Management System policy encompasses activities relating to quality, the environment, health and safety, energy efficiency and information security. These processes are carried out by setting measurable targets, systematically monitoring results and implementing improvement measures. Staff training, internal and external audits, and regular management reviews reported to the Management Board are also conducted, ensuring that activities comply with applicable standards and company policy.

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

The Comarch Group's policies on climate change mitigation and adaptation form an integral part of the Integrated Management System (IMS). The Comarch Group's Integrated Management System encompasses, amongst other things, environmental management (ISO 14001) and energy management (ISO 50001) systems. Within the IMS, environmental and energy policies are the primary tools for implementing measures to **mitigate climate change** and **adapt to its effects**.

6.4. Actions and resources in relation to climate change policies

E1-3

The Comarch Group consistently implements its ESG strategy, integrating environmental considerations into its business operations. The Comarch Group undertakes numerous initiatives aimed at minimising its environmental impact, implementing modern technologies that enhance energy efficiency and promoting environmentally friendly attitudes amongst its employees.

Among the most important projects completed in the past year were:

- the development of photovoltaic infrastructure – the modernisation of the photovoltaic installation on the SSE7 building in Kraków, involving an increase in the system's capacity by 36 kWp,
- the signing by Comarch AG of a contract for the purchase of 1,309,000 kWh of electricity generated by hydroelectric power stations, meeting the stringent TÜV SÜD certification criteria for renewable energy production, with delivery scheduled for 2026 and 2027,
- the continued replacement of lighting with energy-efficient LED solutions in buildings owned by the Comarch Group,
- commissioning of two vehicle charging stations for the Hamburg site,
- carrying out maintenance work on technical equipment located in the building and the data centre in Dresden, including, amongst other things, cleaning and replacing filters and heat exchangers, with a view to improving energy efficiency and reducing energy consumption,
- relocating the Munich office to smaller premises within the same building to optimise operating costs, make better use of available space and reduce electricity consumption.

Investment plans relating to sustainable development for 2026 and subsequent years:

- further expansion of photovoltaic installations, including a planned increase in capacity of approximately 307 kWp,
- purchasing electricity from renewable sources,
- continuation of the replacement of lighting in office buildings,
- continuation of the modernisation of the drives in the remaining air-handling units,
- modernisation of the heating system in the office building on the Kraków campus,
- continuation of the modernisation of the vehicle fleet, involving the replacement of vehicles with conventional petrol and diesel engines with hybrid and electric vehicles,
- expansion of the electric vehicle charging infrastructure.

All of the above measures cover the Comarch Group's own operations, with particular emphasis on office buildings and IT infrastructure in Kraków, Warsaw, Łódź and Rzeszów. Investments in renewable energy also apply to overseas subsidiaries (e.g. Comarch AG in Germany). These measures are aimed at directly reducing primary energy consumption, improving operational efficiency and decarbonising technical infrastructure, thereby supporting the Comarch Group's objectives of reducing CO_2 emissions per employee, increasing the share of energy from its own renewable sources and continuously improving energy efficiency. Progress is monitored through the analysis of energy consumption indicators, CO_2 emission levels and the share of energy from renewable sources.

The measures implemented cover the year 2025, whilst the planned investment measures are scheduled for subsequent years. Long-term decarbonisation initiatives set the direction for the Comarch Group's development, and their final timetable and timeframe for achieving carbon neutrality are currently being reviewed to align them with the latest scientific guidelines from the SBTi initiative.

As part of its efforts to mitigate climate change, the Comarch Group has set targets for reducing greenhouse gas emissions and is currently in the process of verifying them. Once this process is complete, the Comarch Group plans to submit the targets for approval by the SBTi initiative before the end of this year. At the same time, measures are being taken to achieve these targets. However, at the time of drafting this report, a full and verified assessment of the quantitative effects of these measures, in terms of achieved and expected GHG emission reductions, had not yet been carried out. Comarch plans to expand the scope and accuracy of monitoring these indicators in subsequent reporting cycles.

The measures outlined do not require any significant additional operating expenditure or capital expenditure beyond the resources already included in the business budgeting process.

6.5. Targets related to climate change mitigation and adaptation

E1-4

The Comarch Group has not set formal sustainability targets within the meaning of the ESRS and based on the SBTi methodology. At the same time, the Group's Sustainability Strategy includes environmental targets supporting the reduction of the impact of its operations on the environment, the achievement of which is monitored on an ongoing basis.

The effectiveness of environmental measures is monitored on the basis of operational data collected annually from all Comarch Group companies, including both domestic and international entities. This process includes, amongst other things, monitoring greenhouse gas emissions (Scopes 1 and 2), energy consumption, the share of energy from renewable sources, and the energy efficiency of infrastructure, in particular data centres. Environmental data is collected and aggregated in accordance with certified environmental management systems (ISO 14001) and energy management systems (ISO 50001).

As part of the Sustainable Development Strategy, a set of environmental targets has been adopted, forming the basis for assessing the effectiveness of the measures taken, including:

- A 20% reduction in CO_2 emissions per employee by 2027 (compared to 2021),
- Increasing the share of energy from the company's own renewable sources to 20% of total consumption by 2027,
- Continuous improvement in energy efficiency,
- The long-term goal is to strive for climate neutrality by 2040.

This document is currently under review. The Comarch Group is currently in the process of setting decarbonisation targets in line with the international SBTi initiative and the latest scientific guidelines on combating climate change. The process aims to reduce CO_2 emissions, increase the share of renewable energy and implement modern technologies that reduce the carbon footprint.

In light of this, the Comarch Group is working to refine its carbon footprint calculation methodology in order to monitor and reduce emissions even more accurately at every stage of its operations. Particular emphasis is placed on expanding the scope of emissions reporting under Scope 3, Category 11, which will allow for an even more precise analysis of the company's environmental impact and the development of more effective reduction strategies. According to the timetable, the original intention was to submit the finalised targets for approval in September 2026. The Comarch Group is currently verifying the methodology and baseline data used to set its decarbonisation targets.

Thanks to this approach, the Group will be able to fulfil its commitments to minimise its environmental impact more effectively, aligning with global standards for combating climate change and striving to achieve carbon neutrality in the long term. At the same time, the Comarch Group is working on developing a business transformation plan, covering measures to reduce its own emissions and those across the entire value chain. One of the areas under analysis is the technological optimisation of the product portfolio with a view to reducing the impact of their use on greenhouse gas emissions generated by customers.

6.6. Energy consumption and mix

E1-5

Electricity management is a key area for the Comarch Group, being of fundamental importance both for ensuring the continuity of operational activities and for achieving the Group's climate impact reduction targets.

The table presents the actual energy consumption figures and the Comarch Group's energy mix for 2024 and 2025. The indicators below have been determined on the basis of actual consumption. The measurement has not been verified by an external body other than the certification service provider.

Energy consumption and energy mix	Unit	2025	2024	Change 2025/2024
Total energy consumption from fossil fuels, including:	**MWh**	39 555	41 175	-4%
Electricity and heat	**MWh**	27 864	29 034	-4%
Fuels	**MWh**	11 691	12 140	-4%
Share of fossil fuels in total energy consumption	**%**	96	99%	-3%
Total energy consumption from nuclear sources	**MWh**	-	-	-
Fuel consumption from renewable sources, including biomass (which also covers industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.)	**MWh**	-	-	-
Consumption of purchased or procured electricity, heat, steam and cooling from renewable sources	**MWh**	1 185	-	-

Consumption of renewable energy produced in-house without the use of fuel (MWh)	**MWh**	344	349	-1.5%
Total consumption of renewable and low-carbon energy	**MWh**	1 529	-	+338%
Share of renewable sources in total energy consumption	**%**	4%	1%	+3 percentage points
Total energy consumption	**MWh**	**41 085**	**41 524**	**-1%**

In 2025, a 4% decrease in energy consumption from fossil fuel sources was recorded, which was made possible mainly through the purchase of certified green energy for sites in Germany. As a result, the share of renewable sources in the overall energy mix rose from 1% to 4% (+3 p.p.).

Energy intensity based on net revenue

In accordance with Regulation (EC) No 1893/2006 of the European Parliament and of the Council, which sets out the NACE sectoral classification, activities in selected sectors are considered to have a significant impact on the climate.

The Comarch Group's activities have been classified under Section J: Information and communication, which is not among the sectors considered to have a significant impact on the climate.

Consequently, the energy intensity ratio in relation to net revenue from activities carried out in sectors with a significant impact on the climate is not presented.

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

E1-6

Reporting limits for emissions

The organisational boundaries for the greenhouse gas emissions calculations were determined on the basis of operational controls and covered:

- 100% of the emissions of Comarch S.A. as the parent company,
- 100% of the emissions of the subsidiaries forming part of the Comarch Group.

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

The report applied a methodology consistent with the GHG Protocol, in accordance with which emissions were reported across three scopes: Scope 1, Scope 2 and Scope 3.

Scope 1 covers direct emissions resulting from the combustion of fuels in stationary or mobile sources, as well as leaks from air-conditioning and refrigeration equipment. Data on fuel consumption by the vehicle fleet, non-road mobile machinery, machinery, power generators and a yacht (petrol, diesel and LPG) were used to calculate these emissions. Fuel consumption (natural gas, heating oil and LPG) in the heating systems of buildings owned by Polish and foreign companies within the Comarch Group was also taken into account. The emission factors required for the calculations were obtained from the DEFRA UK Government GHG Conversion Factors for Company Reporting database (2025). GWP factors for HFC gases are based primarily on the IPCC Fifth Assessment Report (AR5) for a 100-year time horizon, in accordance with the requirements of the Paris Agreement. In some cases, values from AR4, AR6 or data from EU regulations on F-gases are used if no values are available in AR5.

Scope 2 presents indirect emissions resulting from the consumption of purchased electricity and heat. Both the location-based method and the market-based method have been taken into account. The indicators required to calculate emissions in this category using the location-based method were derived from data contained in the report by the National Centre for Emissions Balancing and Management (KOBIZE, 2025), based on indicators from the report by the Energy Regulatory Office – 'Heat Energy in Figures 2024 for Polish Companies', and from the databases of the Environmental Protection Agency (EPA), L'Agence de la transition écologique (ADEME) and the Umweltbundesamt (UBA) for foreign companies. For emissions calculations using the market-based method, indicators provided by suppliers were used. In the case of the German site, where a green energy certificate covering the entire electricity demand for that site was purchased, the emission factor was 0; consequently, the emissions calculated using the market-based method for this site also amounted to 0 tCO_2e.

The data forming the basis for the calculation of Scope 1 and Scope 2 emissions were sourced from administrative departments, in particular technical administration, fleet management, controlling, and finance and accounting departments.

Emissions	Unit	2024	2025
Scope 1 greenhouse gas emissions			
Gross Scope 1 greenhouse gas emissions	t CO_2e	3 191	2 685
Percentage of Scope 1 greenhouse gas emissions from regulated emissions trading schemes (%)	t CO_2e		

		0	0
Scope 2 greenhouse gas emissions			
Gross Scope 2 greenhouse gas emissions (location-based)	t CO_2e	13 685	12 927
Gross Scope 2 greenhouse gas emissions (market-based)	t CO_2e	17 721	15 117
Significant Scope 3 greenhouse gas emissions			
Total gross indirect greenhouse gas emissions (Scope 3)	t CO_2e	101 564	97 152
1 Purchased goods and services	t CO_2e	15 639	19 680
2 Capital goods	t CO_2e	1 842	2 110
3 Fuel and energy-related activities (not included in Scope 1 or 2)	t CO_2e	4 883	4 334
4 Upstream transport and distribution	t CO_2e	878	81
5 Waste generated from operations	t CO_2e	5	6
6 Business traveling	t CO_2e	1 129	1 100
7 Employee commuting	t CO_2e	1 619	3 043
8 Upstream leased assets	t CO_2e	987	923
9 Downstream transportation	t CO_2e	<0,1	<0,1
10 Processing of sold products	t CO_2e	-	-
11 Use of products sold	t CO_2e	73 865	65 125
12 End-of-life treatment of sold products	t CO_2e	<0,1	<0,1
13 Downstream leased assets	t CO_2e	716	652
14 Franchises	t CO_2e	-	-
15 Investments	t CO_2e	-	-
Total greenhouse gas emissions			
Total greenhouse gas emissions (location-based)	t CO_2e	118 440	112 764
Total greenhouse gas emissions (market-based)	t CO_2e	122 476	114 273

During the period under review, Scope 1 emissions fell by approximately 16%. The main factor contributing to this decrease was a significant reduction in emissions resulting from refrigerant leaks from air-conditioning equipment. A decrease of approximately 74% was recorded in this category, indicating improved system integrity, modernisation of equipment or the replacement of previously used refrigerants with substances having a lower global warming potential.

The reduction in emissions from the largest Scope 1 source – the company's vehicle fleet – also had a significant impact on the reduction in total emissions. Emissions in this category fell by approximately 13%.

The only area where an increase in emissions was recorded, despite the overall downward trend, was the combustion of fuels in stationary boilers. Emissions from this source rose by around 10%, which may have been due to greater demand for heating as a result of a more severe heating season.

Scope 2 emissions also fell during the period under review, according to both the location-based and market-based methods. Under the location-based approach, emissions fell by 6%, whilst under the market-based approach a more pronounced decrease of 15% was recorded. The main factor contributing to the reduction was the reduction in emissions associated with the purchase of electricity. In this category, emissions fell by approximately 7% under the location-based approach and by approximately 17% under the market-based approach. The greater scale of the reduction under the market-based approach resulted from the procurement of lower-emission electricity for sites in Germany in 2025.

The positive effect of the reduction in emissions was partly offset by an increase in emissions associated with the purchase of thermal energy, which rose by approximately 5%. This change may have been due to greater demand for heating, caused by a more severe heating season.

Under Scope 3, the Comarch Group carried out a detailed materiality assessment of individual emission categories. For each relevant category, the most detailed data possible was collected, on the basis of which emissions were estimated. 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, whilst highlighting those that require greater attention when defining greenhouse gas emission reduction targets across the Comarch Group's entire value chain. No biogenic emissions were identified as part of the analysis.

During the period under review, the company carried out a very thorough verification of its emissions calculations, as well as the input data it had obtained internally. As a result of this process, methodological errors were identified and corrected in specific Scope 3 categories, which in the previous iteration of the report (for 2024) had significantly overestimated the results and led to an inaccurate assessment of the organisation's actual environmental impact. The corrections related in particular to Categories 3, 4, 8 and 12. These errors did not stem from the calculation methodology itself, but were of a technical nature and occurred during the transcription and consolidation of input data. They included, amongst other things, the use of incorrect orders of magnitude for units of measurement and data entry errors (e.g. decimal point shifts). Correcting these errors enabled the reporting process to be fully realigned with reality and made more robust, which in turn resulted in a reliable assessment of the actual impact of these categories on the total balance of Scope 3.

UPSTREAM		
Category name	**Materiality level [%]**	**Method of calculating emissions**
1. Purchased goods and services *Emissions resulting from the procurement of products (both raw materials and finished goods) and services purchased or acquired by the company during the reporting year, which have not been classified as fixed assets*	20	The calculation of emissions and the materiality analysis within Category 1 (Purchased goods and services) and Category 2 (Capital goods) were carried out using *a spend-based approach*. To ensure the highest possible completeness of data, the reporting scope covered 100% of expenditure in both categories (the materiality threshold was set at 100%). The source data for the calculations was obtained from the Comarch Group's internal systems: • For Category 1, full operating cost data from the financial and accounting systems was used. • For Category 2, data on capital expenditure (CapEx) was obtained from internal controlling systems. Non-emission-related charges (e.g. bank charges, stamp duties and public law charges) and expenditure whose carbon footprint was directly attributed to other Scope 3 categories were excluded from the analysis, thereby avoiding double counting. As part of ongoing efforts to improve the quality of reporting, the cost register for 2025 was revised and supplemented with additional procurement categories not previously included. Data for 2024 was updated accordingly and recalculated to ensure the comparability of cost structures. For Category 2, in order to significantly improve data quality in 2025, the reporting process was also extended to include the Group's foreign subsidiaries. To maintain full comparability of data over time, data for foreign companies was also retrospectively collected for 2024, and a complete recalculation of base-year emissions was carried out. The mapping of expenditure and the assignment of appropriate emission factors were carried out using the international Climatiq database. The emission factors from this database are expressed in foreign currencies; therefore, the cost data were first converted into the currency of the emission factor using the average exchange rate for 2024 (as per the company's financial statements). At the same time, the emission factors were adjusted for inflation to bring the reference base into line with the price level of the reporting year. The final emissions calculation (tCO_2e) is the product of the currency-adjusted costs and the inflation-adjusted emission factors. Analysis of the results: In 2025, a similar upward trend in greenhouse gas emissions was observed in both Category 1 and Category 2 compared with the previous year. The higher figures in both areas are a direct consequence of the expansion of the Comarch Group's operational scale, the dynamic growth of its business and the intensification of its investment processes. Given the nature of the *spend-based* approach, the increase in procurement and investment budgets naturally resulted in a higher final carbon footprint. This increase is purely business- and operations-related. It stems solely from the Comarch Group's actual growth in 2025, as the historical data for 2024 in both categories has been recalculated and brought into full methodological and structural consistency.
2. Capital goods *Emissions resulting from investments in tangible assets and equipment that the company uses to manufacture products, provide services, or sell, store and distribute goods.*	2	
3. Fuel and energy-related activities (not included in Scope 1 or 2) *Emissions resulting*		Emissions under Category 3 were calculated for all facilities and assets owned or operated by the Comarch Group over which the company exercises full operational control – both in Poland and at overseas locations. Within the reporting boundaries , the consumption of the following utilities and energy resources was identified and analysed: • electricity and heat,

from the extraction, production and transport of fuels and energy purchased or acquired by the company during the reporting year, which are not included in Scope 1 or Scope 2, including, amongst other things, transmission and distribution losses.	5	• petrol and diesel for the operation of the vehicle fleet, • electricity used to power the electric vehicle fleet, • LPG and light fuel oil for heating purposes, • diesel intended for the emergency power generator. The carbon footprint calculations for this category covered two key components in accordance with the GHG Protocol guidelines: emissions associated with the extraction, production and transport of fuels and energy (WTT – Well-to-Tank) and losses arising during the transmission and distribution of electricity and heat (T&D – Transmission and Distribution). Sources of emission factors: • T&D processes (Poland): The national transmission loss factor was used, calculated directly on the basis of official data contained in reports from the National Centre for Emissions Balancing and Management (KOBiZE). • T&D processes (abroad): Reference indicators adapted to local markets were used, sourced from the DEFRA (2025), UBA (for the German location) and ADEME (for the French location) databases. • WTT processes: In most cases, international emission factors obtained from the BEIS database were used, supplemented by data from DEFRA (2025) and ADEME. In order to ensure the highest level of reporting accuracy at all times, a detailed review of historical data was carried out in 2025. During the verification, a systemic error was identified, involving the use of an incorrect unit of measurement for energy consumption at one of the sites. Correcting this parameter to reflect the actual situation resulted in a significant reduction in the reported emissions figure for that consumption point. In line with the principle of comparability, the data for 2024 were updated accordingly and recalculated using the correct unit of measurement. In 2025, a marked decrease in greenhouse gas emissions was recorded under Category 3. The total volume of emissions in this area fell from 4 882,79 tCO_2e in the recalculated year 2024 to 4 333,50 tCO_2e in 2025, representing a decrease of 11,25%.
4. Upstream transport and distribution *Emissions associated with the transport of purchased or sold products, from suppliers and to customers respectively, to and from the reporting company.*	< 1	In 2025, the Comarch Group undertook intensive measures to improve the accuracy and reliability of data relating to logistics and transport operations. To this end, an integrated process for mapping parcel flows was implemented, based on three complementary data sources: • Incoming shipments: From February 2025, a system for the detailed recording and reporting of parcels arriving at reception desks at the Group's own premises (including its head office in Kraków) and at all leased premises across Poland was implemented. This made it possible to replace previous estimates with actual volume data. • Outgoing parcels: Data on parcels dispatched by the Group to customers and business partners was obtained directly from the original operational reports of external transport (courier) companies. • Direct deliveries: Shipments processed under the direct model – from an external supplier directly to the end customer, bypassing the Group's physical premises – were identified and taken into account. These data were reported by the logistics division. To ensure due completeness and the highest quality of data, a detailed audit of the reporting boundaries was carried out. In areas where, for operational reasons, precise logistics reports were lacking – which concerned foreign subsidiaries and KS Cracovia S.A. – a hybrid allocation method was applied. Emissions for these entities were estimated on the basis of financial data (expenditure on logistics services) extracted from the Category 1 cost database.

		In accordance with the principle of comparability, the data for 2024 was fully recalculated by retrospectively adding emissions estimated on the basis of the logistics costs of the foreign subsidiaries and KS Cracovia S.A. The carbon footprint calculation was carried out using international emission factors from the DEFRA database (2025). The calculations were based on actual transport performance (the product of the weight of consignments and the distance travelled). Where detailed data was missing, conservative modelling assumptions and a *proxy* methodology (estimating distance based on postcodes/delivery zones) were applied. In 2025, a 91% reduction in greenhouse gas emissions was recorded under Category 4 compared with the recalculated figure for 2024. The main factor behind such a sharp reduction in the carbon footprint in this area was the sale of the IoT (Internet of Things) segment. In 2024, this division's operations generated the lion's share of transport emissions across the entire Comarch Group.
5. Waste generated from operations *Emissions associated with the treatment and disposal of waste generated by the company during its operational activities.*	< 1	Emissions under Category 5 were calculated on the basis of data on the mass of waste generated, which was obtained directly from the official Waste Database (BDO). Within the structure of waste generated by the Comarch Group, the main waste streams identified were waste electrical and electronic equipment, batteries and accumulators, medical waste and packaging materials. For each of these waste types, an appropriate emission factor was applied, and the method of their disposal in the given reporting year was determined on the basis of legal regulations and information obtained from the companies collecting waste from the Group. On this basis, it was established that waste from the category of electrical and electronic equipment and packaging materials is 100% recycled, whilst medical waste is 100% disposed of through incineration. The source of emission factors for electrical equipment and packaging materials was the DEFRA international database, whilst the ADEME database was used for specific medical waste. In 2025, a slight increase in emissions within this category was recorded compared with the previous year. The main reason for this increase was that, in 2025, a Comarch Group site operating in the USA reported its waste for the first time. Due to its small size, this branch had not reported any current waste in previous years. However, in 2025, a major clearance and tidying operation was carried out there, resulting in the disposal of waste accumulated over the last few years, which caused a one-off increase in this year's waste volume. Despite this temporary increase, the entire category accounts for less than 1% of the Comarch Group's total Scope 3 emissions; it has therefore been deemed immaterial in terms of the Group's overall carbon footprint and environmental impact.
6. Business travel *Emissions associated with business travel by Comarch employees.*	1	The calculation of emissions under Category 6 covered business travel by Comarch Group employees, both domestically and internationally. Four main modes of transport were specified within this category: rail, air, urban transport (buses and minibuses) and taxi services. At the current stage of data collection, the *spend-based approach* – based on the financial expenditure incurred on individual modes of transport during business trips – was deemed the most appropriate method for estimating the carbon footprint. Cost data were provided by the Accounts Department, whilst emission factors were obtained from the international EPA database. These factors specify the amount of emissions per unit of value for a given mode of transport in relation to the purchase price of the services (the so-called acquisition price). Emissions calculations were carried out in the same way as for Categories 1 and 2. As the selected indicators from the EPA database are expressed in foreign currencies, the cost data in zlotys were first converted into the currency of the indicator using the average exchange rate for 2025, as per the company's official financial statements. At the same time, the emission factors were adjusted for inflation to bring the reference base into line with the price levels of the reporting year.

		The final emission calculation is the product of the currency-adjusted costs and the inflation-adjusted emission factors. To ensure the data was complete, a detailed verification of the reporting scope was carried out to include all entities belonging to the Group. In areas where direct reports from subsidiaries were missing – which concerned foreign subsidiaries – an allocation method was applied. Emissions for these entities were separated from the Category 1 cost base and recalculated using universal cost factors. In accordance with the principle of comparability, the data for 2024 were fully recalculated by retrospectively adding emissions from the previously missing foreign companies. In 2025, a slight decrease in greenhouse gas emissions was recorded in this category – from 1 128,81 tCO_2e in the recalculated year 2024 to 1 099,64 tCO_2e in 2025.
7. Employee commuting *Emissions associated with employees' daily commutes to the office.*	3	Emissions under Category 7 were calculated on the basis of a detailed survey conducted amongst Comarch Group employees in 2025. The survey was made available on the internal company portal. The questionnaire took into account parameters such as: • the type of transport used (including multimodal transport), • the total distance travelled between the place of residence and the place of work, both ways, • the seasonality of journeys – with separate details of distance and means of transport for the spring–summer and autumn–winter periods, • the amount of remote working declared by each respondent, • the adjusted number of working days in 2025, taking into account public holidays and annual leave. The structure of the responses indicated a predominance of private car travel, mainly petrol and diesel vehicles, with a lower share of public transport and marginal use of zero-emission modes (cycling and walking), which translates into higher emissions per employee. In 2024, despite a higher number of employees and responses, average emissions were lower due to a greater share of public transport and zero-emission modes, as well as a lower share of combustion-engine cars, particularly during the spring and summer months. The comparison shows that the higher emissions in 2025 result from a shift in the commuting mix towards a more em . This includes greater use of combustion-engine cars, a seasonal increase in their use during the autumn and winter months, and longer commuting distances. These factors lead to an increase in average emissions per person and, consequently, higher total emissions. Emissions factors (taking into account CO_2, CH_4 and N_2O) from the DEFRA and Climatiq databases were used for the calculations. For locations in Poland, the DEFRA database was used, whilst for overseas locations an attempt was made to match the relevant factors to specific geographical locations in the Climatiq database. In cases where the Climatiq database did not provide a suitable factor for a specific mode of transport at a given location, DEFRA factors were used as the recognised international standard.
8. Upstream leased assets *Emissions associated with assets leased by the company in the upstream supply chain, i.e. those leased from other companies and used in the company's operational activities.*	1	The calculation of emissions under Category 8 covered spaces within office premises and entire buildings used by the Comarch Group, both domestically and internationally. As these premises – particularly those located abroad – are not directly controlled by the reporting company, collecting accurate operational data on utility consumption (electricity and heat) presented a methodological challenge in many cases. This was mainly due to the use of flat-rate charges covering the total cost of utilities without a breakdown by individual energy types, as well as the lack of dedicated metering for leased premises. Data on building floor areas and the consumption of individual utilities were provided by the Administration Department and the property managers of the respective premises. Where actual energy consumption data was unavailable, an area-based

		approach was adopted. In such cases, data from the Joint Research Centre (JRC) report – *'Environmental benchmarks for buildings – JRC Technical Reports'* – was used, presenting reference emission values per unit of floor area. Furthermore, in situations where Comarch rents only individual desks or flexible co-working spaces, it was necessary to estimate the floor area of the workstations. Assumptions were made in line with the guidelines of the European Agency for Safety and Health at Work (EU-OSHA), which specify a minimum office space of 6 m² per workstation, using a conservative representative value of 8 m² in the calculations. The emission factors for the purchase of electricity and heat were derived from the same reference databases as those used to calculate the carbon footprint under Scope 2. For the purchase of electricity in Poland, data from the National Centre for Emissions Balancing and Management (KOBiZE) was used, whilst for foreign markets, factors were obtained via the global Climatiq database, which integrates, amongst others, the registers of the EEA, ADEME, UBA, Covenant of Mayors, Carbon data across GCP regions, EPPO, CO_2 Emissiefactoren and Electricity Maps. For thermal energy in Poland, the report by the Energy Regulatory Office (URE) entitled *'Thermal Energy in Figures 2024'* was used, whilst for foreign locations, figures from the UK's BEIS and Germany's UBA were utilised. In line with the principle of data completeness, for several overseas locations (mainly in Germany), in the absence of updated data from suppliers for the reporting year, a proxy data method was applied, assuming consumption levels equivalent to those of 2024. Emissions under Category 8 account for a small proportion of the Group's carbon footprint, representing approximately 1% of total Scope 3 emissions. In 2025, a positive trend was observed in this area – emissions in this Category fell by approximately 7% compared with 2024.
DOWNSTREAM		
9. Downstream transportation *Emissions associated with the transport of products from the company to its customers following their sale.*	< 1	As part of the Scope 3 analysis, emissions were identified in Category 9, which covers logistics operations related to the delivery of Comarch products to the end customer. The scope of calculations in this category covered only shipments carried out under the direct model (from supplier to customer), excluding warehouses and the company's physical premises. In accordance with the GHG Protocol guidelines, Category 9 included those goods shipments for which the cost was borne directly by the customer. The data required for reporting emissions was provided by the Logistics Department. Emissions were estimated using a distance-based approach, based on the weight of the consignments and the transport distance calculated from the points of dispatch and destination. In the few instances where complete operational data was lacking, an estimation method was used based on average values derived from reports containing complete information. The emission factors used to calculate the carbon footprint were obtained from the UK's DEFRA reference database (version for the 2025 reporting year). Total greenhouse gas emissions for Category 9 during the reporting period amounted to 0,0032854 tCO_2e. This low level of emissions stems directly from the limited scale of deliveries carried out under this specific logistics model, in which transport is financed by the customer. As emissions from this category account for significantly less than 1% of total Scope 3 emissions, this category has been deemed immaterial in terms of the Group's overall carbon footprint. However, to ensure full transparency and completeness of reporting, it was decided to quantify it.
10. Processing of sold products *Emissions resulting from the processing*	0	No calculations were carried out for this category due to a lack of available data that could be used for this purpose. The products and services offered by the company primarily comprise its own software and IT services, which are supplied as end-user solutions – ready for use by the customer, without the need for further processing,

of sold intermediate products by third parties (e.g. manufacturers) following their sale by the reporting company. Intermediate products are those that require further processing, transformation or incorporation into another product before use, and therefore give rise to emissions associated with their processing after sale by the reporting company but before use by the end consumer.		assembly or integration with physical products as part of manufacturing processes. In addition, the Comarch Group also offers third-party hardware and software, which are likewise end products intended for direct use by customers. Consequently, none of the products or services offered are classified as intermediate products within the meaning of Category 10 in accordance with the GHG Protocol.
11. Use of products sold *Emissions generated by customers whilst using products sold by the company.*	67	As part of the Category 11 calculation, the Group conducted a detailed environmental analysis of five key areas of its operational activities. The scope of reporting covered: • The purchase of third-party software and its resale to end customers • The purchase and resale of physical hardware from external suppliers • The provision of integrated hardware and software solutions • Development and sale of proprietary software • Infrastructure supporting projects in server rooms leased abroad For most areas relating to the distribution and delivery of hardware, a standardised, consistent analytical procedure based on commercial and financial reports was applied. In order to accurately estimate the carbon footprint during the operational phase, products were mapped and grouped into technological categories with similar operational profiles, with standard market-based models for power consumption, allocation and annual operating time assigned to them. In the third-party software segment, licences were divided into product groups (server, desktop and network), using appropriate models for allocating energy per user or per processing core. In accordance with the principle of materiality and to avoid double counting, intangible items such as technical support licences (Maintenance) and certificates were excluded from the calculation. The total contribution of this area was estimated at approximately 2% of the total carbon footprint in the category under review. In the area of third-party physical hardware, the analysis covered active IT infrastructure operating continuously, mobile devices and terminals charged periodically, and monitors. Internal components (which are energy-dependent on parent units), passive accessories and single-use consumables were consistently excluded from the calculations. To reflect actual operating conditions at customers' sites as accurately as possible, the baseline parameters were adjusted by an average working load factor. The lifespan of individual device classes (ranging from mobile devices to advanced industrial computers) was aligned with standard depreciation and replacement cycles in a business environment. The total contribution from third-party hardware amounted to approximately 1% of total Category 11 emissions.

		In the case of the supply of integrated hardware and software solutions, the calculation included proprietary devices from the IoT and telemedicine sectors (including cardiac monitoring systems and time-and-attendance gateways). Due to their high energy efficiency and ultra-low-power design, their consolidated emissions contribution was estimated at less than 1% of the Category 11 footprint. For network infrastructure in server rooms leased abroad, which are outside the Group's operational control, an estimation model based on data transfer volume and dedicated regional indicators for network transmission was applied. A significant methodological adjustment was implemented here – data transfers from the Group's own server rooms were completely excluded, as their energy consumption is already fully and accurately reported under Scope 2, thereby eliminating the risk of double counting. Electricity emission intensity indicators for all the above areas were precisely matched to the geographical location of system use – official KOBiZE data were used for the Polish market, whilst international reference indicators from the Ember Institute were used for global users. The area of in-house software was subjected to the most detailed analysis, as it accounts for **96% of the total carbon footprint in Category 11**. It is this segment that fully determines the direction of change and the final environmental outcome for the entire organisation. Given the extensive portfolio of in-house products, the ERP systems sector was selected as a representative and best-measured research sample for detailed calculations, within which the main central platforms were identified. Smaller satellite applications were excluded as separate items, as they share the same hardware infrastructure with the main systems and separating them would lead to double counting. Based on commercial data and expert estimates of the average number of workstations per company, a realistic baseline of active end-users generating energy consumption was established. Depending on the software distribution model, separate system boundaries were applied: • In cloud-based models (SaaS), only the electricity consumption of the user's computer was taken into account (whilst emissions from cloud servers were included in Scope 2 of Comarch). • In on-premises models, the boundary was extended to include the physical server infrastructure located directly at customers' premises. The reference software lifecycle was set at 1 year, which reflects the annual growth in the active user base and precisely prevents the duplication of the same data across successive reporting periods. The resulting emission intensity indicator per unit of revenue for the ERP sector was ultimately extrapolated to the entire organisation using total revenue from the sale of proprietary software. In the 2025 reporting year, a year-on-year decrease of approximately 12% was recorded in estimated emissions from the use of sold hardware and software (from 72 063 tCO_2e to 62 377 tCO_2e). A detailed analysis of the data indicates that the main factor determining this result was a change in the Group's revenue structure, rather than an actual reduction in the energy intensity of products at the end-user level. As the current calculation methodology is based on financial extrapolation, the emission factor determined directly for the reference sector (ERP) is projected onto the other proprietary software business lines using their share of total revenue. In 2025, an

		increase in revenue was recorded in the ERP sector, accompanied by a significant decline in revenue from software sales in other sectors. This result therefore primarily reflects changes in the revenue structure, rather than a physical reduction in the energy consumption of products by end-users. Nevertheless, a detailed analysis of the ERP sector itself revealed a positive trend: lower emissions were recorded from the use of traditional on-premises products, whilst higher emissions were recorded from cloud-based products. This reflects the strategic direction the company is pursuing, namely the gradual transition of customers to the cloud model (SaaS). Shifting the computational load to the cloud is a key step towards the decarbonisation of digital services. Cloud computing architecture is significantly more energy-efficient than distributed on-premises infrastructure across thousands of individual customers. Aware of the methodological limitations of financial extrapolation, which may distort the true environmental picture depending on market fluctuations, the Group has taken corrective action. The company is currently carrying out a process to identify and calculate the physical carbon footprint of products from its other business sectors in detail. The aim is to move away entirely, in the coming years, from revenue-based estimates in favour of indicators based on the most accurate operational data possible. This will enable the creation of a comprehensive, reliable and market-distortion-free emissions map of Comarch's product portfolio.
12. End-of-life treatment of sold products *Emissions associated with the end of the life cycle of products sold by the company, i.e. processes that take place after the end of their operational life, such as recycling, disposal or waste storage.*	< 1	As part of its Scope 3 emissions reporting, the Group undertook a detailed environmental analysis of Category 12 (*End-of-life treatment of sold products*). The calculation process involved identifying and estimating emissions resulting from the disposal, recycling and management of physical equipment placed on the market by Comarch Group companies following the end of its useful life by end users. This analysis covered a total of three main areas: the supply of proprietary integrated hardware and software solutions (including IoT and medical devices), the resale of physical equipment sourced from external suppliers, and devices distributed in overseas markets. The data required to carry out the calculations was obtained from the departments responsible for logistics, management systems and finance within the Group. For most areas, the analytical process was based on a standardised waste stream mapping procedure. On the basis of system descriptions and commercial specifications, products were assigned to homogeneous product groups, to which conservative, market-averaged weight parameters were applied. In the case of data from subsidiaries, where it was not possible to directly determine the volume, the number of units and their mass were estimated based on an analysis of the net transaction value and reference market prices for the equipment. To determine the carbon footprint of the management of waste electrical and electronic equipment, the international *Open-loop* reference indicator *for WEEE – mixed,* published by the UK's DEFRA, was used. As with physical devices in Category 11, internal components and dependent sub-assemblies (such as RAM chips or processors) were excluded from the calculation to avoid double-counting, as their mass is already accounted for in the weight characteristics of the finished parent devices. As a result of these calculations, the total carbon footprint in Category 12 for the entire Group amounted to approximately 0.07 tonnes of CO_2e (which represents significantly less than 1% of total Scope 3 emissions). Given such a minimal impact on the company's environmental profile, this area – in accordance with the principle – was deemed in this year's report to be an immaterial component of the Group's

		carbon footprint, whilst also demonstrating the marginal energy consumption of the disposal processes for Comarch's equipment portfolio.
13. Leased assets *Emissions associated with the operation of assets owned by (acting as the lessor), which are leased to other entities during the reporting year.*	1	The calculation carried out involved the identification and quantification of the carbon footprint generated by the use of business and office spaces which are owned by the company but are leased and managed operationally by external entities. These premises are located in Poland. The calculation process covered the consumption of key utilities in these premises: electricity, district heating and gaseous fuels. To convert the energy sources consumed into carbon dioxide equivalents, official emission factors were used: those from the KOBiZE database for electricity conversion, the 'Heat Energy in Figures 2024' report by the Energy Regulatory Office (URE) for converting district heating, and DEFRA for converting fuel data. The data used for the calculations in this category was provided by the Administration Department and the site managers of the individual locations. In the 2025 reporting year, emissions in this category fell by approximately 8% year-on-year. Analysis of the data revealed an overall downward trend for each energy source: electricity, heat from the grid and fuels.
14. Franchises *Emissions associated with the activities of franchisees operating under the reporting company's brand. Emissions in this category include the activities of companies operating under a franchise agreement that sell products or services under the franchisor's brand.*	0,0	The Comarch Group does not operate on a franchise basis. The Comarch Group has no franchisees who sell its products or services under its brand, but offers its services and products directly to customers. For this reason, this category was deemed immaterial and excluded from Scope 3 emissions reporting.
15. Investments *Emissions associated with 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 greenhouse gas emissions, but over which the company has no operational control.*	0,0	The Comarch Group does not engage in investment activities to such an extent as to generate emissions associated with investments in other companies or projects. The Comarch Group does not engage in financial investments that would affect greenhouse gas emissions within the scope of its Scope 3 commitments. Furthermore, the absence of investments in assets that could be associated with significant emissions means that this category is immaterial in the context of Comarch's total carbon footprint. For this reason, Category 15 'Investments' has been deemed immaterial and excluded from Scope 3 emissions reporting.
	100	

In order to standardise the data to the units used in the emissions indicators, the average exchange rates for 2025 were applied, in line with the rates used in the preparation of the Comarch Group's financial report.

Scope 1 and Scope 2 emissions account for approximately 2% and 11% respectively of the Group's total carbon footprint, in accordance with the location-based method. Scope 3 accounts for approximately 86% of total emissions. Of all the Scope 3 emission categories, three were deemed material as they collectively account for over 92% of emissions in this scope:

- Cat. 1: Purchased goods and services – 20%
- Cat. 3: T&D and WTT emissions – 5%
- Cat. 11: Use of products sold – 67%

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

Greenhouse gas emissions intensity based on net revenue

The greenhouse gas emissions 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 Section II of the Consolidated Profit and Loss Account – from the Consolidated Financial Statements.

GHG intensity per net revenue	Unit	2024	2025
Total greenhouse gas emissions (according to the location-based method) per net revenue	t eCO_2/thousand PLN	0,062	0,056
Total greenhouse gas emissions (using the market-based method) per net revenue	t eCO_2/thousand PLN	0,064	0,057

None of the metrics presented in this chapter have been validated by an external body other than the certification service provider.

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

E1-7

In 2025, the Comarch Group did not undertake any greenhouse gas removal or emission reduction projects financed through carbon credits. In the immediate strategic outlook, the Comarch Group does not anticipate undertaking any such activities. All decarbonisation efforts are focused on directly reducing the Group's own emissions.

6.9. Internal carbon pricing

E1-8

The Comarch Group does not use any systems for setting internal carbon prices. Nor are there any plans to implement such a mechanism in the near future.

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

E1-9

As part of disclosure E1-9, the Comarch Group has availed itself of the exemption provided for in the applicable regulations, introduced by Commission Delegated Regulation (EU) 2025/1416 of 11 July 2025, amending Delegated Regulation (EU) 2023/2772 with regard to the postponement of the date of application of selected disclosure requirements.

7. Resource use and the circular economy

7.1. Policies related to resource use and the circular economy

E5-1

The Comarch Group has not implemented a uniform policy on resource use and the circular economy (CE). The Group has other internal documents addressing CE issues. Key aspects are implemented through internal procedures and established management systems, including the ISO 14001 standard and, indirectly, the ISO 50001 standard.

The Comarch Group also has waste management procedures in place, as well as the objectives set out in the Integrated Management System Policy described in section E1-2. Waste is collected selectively to prevent its negative impact on the environment. With regard to the transport and disposal of waste, the Comarch Group works exclusively with authorised entities that possess the technical resources and administrative authorisations required to manage the waste entrusted to them in a manner that is safe for people and the environment. The companies of the Comarch Group operate in accordance with the Waste Electrical and Electronic Equipment Act, the Batteries and Accumulators Act and Accumulators Act and the Packaging and Packaging Waste Management Act.

7.2. Activities 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 use of electrical and electronic equipment, which is subject to periodic depreciation and replacement.

Before classifying equipment as waste, it is assessed on a case-by-case basis to determine whether it can be reused within other Comarch Group entities or transferred or resold to external parties.

The Comarch Group organises the collection of waste electrical and electronic equipment and carries out selective waste management in accordance with applicable legislation, such as: the Act of 14 December 2012 on Waste and the Act of 11 September 2015 on waste electrical and electronic equipment, as well as the EU WEEE Directive (2012/19/EU).

Between 2026 and 2028, the Comarch Group plans to continue its efforts to support the circular economy in the field of IT equipment across all operating companies covered by the IT asset management system. Planned activities include further standardisation and harmonisation of procedures relating to the recovery and reuse of equipment, the development of cooperation with recycling partners, and an analysis of the feasibility of introducing circular economy indicators for IT equipment.

Both the measures currently being implemented and those planned are aimed at extending the life cycle of assets and reducing the generation of unnecessary waste.

These activities are ongoing and are implemented at an operational level in each reporting year. They cover all operational units of the Comarch Group in Poland and abroad, with a focus on locations housing technical and office infrastructure. Both internal administrative and IT departments, as well as external partners specialising in waste management, are involved in these activities. These initiatives also involve employees, amongst whom environmental awareness and a responsible approach to the use of equipment and resource management are promoted.

The measures outlined do not require any significant additional operating expenditure or capital expenditure beyond the resources already included in the operational budgeting process.

7.3. Targets related to resource use and the circular economy

E5-3

The Comarch Group has not set uniform, measurable targets relating to resource use and the circular economy within the framework of the ESRS. Results-oriented targets will be defined following the update of the sustainability strategy.

The effectiveness of measures implemented in the area of the circular economy is monitored on the basis of operational data collected annually from all Polish companies within the Comarch Group. This process involves monitoring the quantity and type of waste generated. Environmental data is collected and aggregated in accordance with applicable legal requirements and a certified environmental management system (ISO 14001).

As part of the Sustainable Development Strategy, a set of strategic objectives relating to the circular economy has been adopted, forming the basis for assessing the effectiveness of the measures taken, including:

- reducing the volume of waste generated and managing it responsibly, including the separate collection of waste,
- the collection, recovery and recycling of end-of-life electrical and electronic equipment, packaging and batteries.

7.4. Resource inflows

E5-4

The nature of the Comarch Group's business, which focuses primarily on software development, cloud services, implementation and maintenance services, means that the Comarch Group does not make significant direct use of tangible resources such as raw materials or semi-finished products. The goods produced by the Comarch Group are predominantly intangible in nature. Finished goods are produced on a limited scale and account for only a marginal part of the Group's operating activities. Production processes in this area are carried out in selected companies and do not have a material impact on the Group's total resource consumption.

Consequently, the resources acquired were mainly purchased tangible fixed assets used in the Group's own operations, in particular in technical and office infrastructure and data centres. In 2025, the key categories of resources acquired included:

- Servers,
- Laptops and computers,
- Monitors,
- Other equipment – this category also included other items of office equipment, such as printers, routers, tablets, telephones and external hard drives – which complement the core IT infrastructure and support the Group's day-to-day operations.

Assets introduced to the Comarch Group:

	Unit	2025	2024
Total weight of products introduced into the organisation	tonne	**13,04**	**9,90**
Laptops and Computers	tonne	2,29	1,74
Servers	tonne	3,47	2,99
Monitors	tonne	5,49	3,74
Other devices	tonne	1,79	1,43
Technical materials	tonne	**0**	**0**
Biological materials	tonne	**0**	**0**
Percentage of biological materials	%	0	0
Percentage of sustainably sourced materials	%	0	0
The mass of reused or recycled components, products and secondary materials.	tonne	0	0
Percentage of reused or recycled components, products and secondary materials	%	0	0

Data on the weight of products placed on the market in 2024 and 2025 have been estimated based on the number of units of equipment purchased as part of the Comarch Group's own operations, in accordance with information from internal systems. The weight of individual devices 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 the relevant manufacturer was used; where no information on the manufacturer was available, the average weight for the relevant product type was assumed.

In the tables presented, the data for 2024 has been revised. This change results from a detailed re-verification of the calculation processes, which enabled the elimination of previously identified inaccuracies. Furthermore, to provide a more comprehensive picture of the scale of operations, the new calculations have been expanded to include data from the Comarch Group's foreign subsidiaries.

The metrics presented above have not been approved by any external body other than the assurance service provider.

7.5. Resources outflows

E5-5

In its operations, the Comarch Group adheres to the European waste management hierarchy, with the aim of deriving the maximum practical benefits from products whilst generating the minimum amount of waste, thereby reducing adverse environmental impacts. With regard to both its own needs and those of its customers, waste management is based primarily on preventing waste generation through reuse and extending the life cycle of materials, as well as on recycling and recovery processes, and, as a last resort, on disposal. Waste management within the Comarch Group complies with applicable legislation, including primarily the Waste Act and its implementing regulations.

As a result of its non-industrial activities, the Comarch Group generates municipal waste, i.e. waste associated with the company's non-industrial operations, arising from the domestic activities of its employees, the composition of which is similar to that of household waste. This waste is subject to separate collection, and the local authority is responsible for its collection on the basis of a submitted declaration (in accordance with the Act on the Maintenance of Cleanliness and Order in Municipalities).

As a result of its business activities, the Comarch Group generates non-hazardous waste and hazardous waste, to which it applies uniform waste classification rules in accordance with the applicable regulations. Data on hazardous and non-hazardous waste generated by the companies of the Comarch Group can be found in the Database on Products, Packaging and Waste Management (BDO), which is available at: www.bdo.mos.gov.pl.

All Polish companies within the Comarch Group whose operations result in the generation of waste have been registered in the BDO and hold an individual registration number issued by the relevant provincial marshal. All waste-related record-keeping obligations (waste transfer notes and waste record sheets) and waste management reporting obligations incumbent upon the companies of the Comarch Group are fulfilled exclusively in electronic form via the BDO.

The Comarch Group has implemented procedures and guidelines for waste management. Waste is collected selectively in a manner that prevents its adverse impact on the natural environment. Comarch Group companies, in relation to the transport and collection of waste, cooperate exclusively with entities that hold the relevant environmental authorisations (permits to carry out activities relating to collection, transport and recovery) and assume full responsibility for the subsequent handling of the waste handed over to them.

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

Type of waste	Unit	2025	2024*
IT sector	metric tonne	**46 886**	**23 359**
Electrical and electronic equipment	metric tonne	23 523	16 37271
Batteries and accumulators	metric tonne	10 501	0.054
Paper and paper packaging	metric tonne	12,86	6,93
Medical sector	metric tonne	**6,002**	**5,894**
Medicines	metric tonne	0,004	0,006
Other waste containing viable pathogenic micro-organisms or their toxins, and other forms capable of transmitting genetic material, which are known or for which there are credible grounds to believe that they cause disease in humans and animals	metric tonne	5,998	5,888

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

The largest proportion of the waste stream generated by the Comarch Group (approximately 63%) consists of 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 used by staff in their day-to-day duties as a work tool. Before electrical and electronic equipment is classified as waste, it is assessed for potential further use within the Comarch Group or by external entities. Waste classified under code 16 02 14 is transferred to a specialist company, where it undergoes R12 recovery processes (in accordance with the Waste Act, R12 refers to the treatment of waste to subject it to any of the processes listed under R1 – R11), in an automated dismantling line, where advanced processing techniques are used to produce high-quality products.

The next largest proportion of the waste stream generated by the Comarch Group (approximately 28%) consists of 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 the iMed24 Medical Centre, which forms part of Comarch Healthcare S.A. Waste with codes 18 01 03* and 18 01 09 is transferred to a company specialising in the disposal of medical waste and undergoes the D10 disposal process (in accordance with the Waste Act, D10: thermal treatment on land), which involves the thermal treatment of waste in advanced facilities that generate thermal and electrical energy.

Waste	Unit	2025*	2024**
Total quantity of hazardous waste for which disposal has been avoided	**tonne**	**12,23**	**0,721**
of which preparation for reuse	tonne	0	0
of which recycled	tonne	10,42	0
of which other recovery processes	tonne	1,81	0,721
Total quantity of non-hazardous waste for which disposal was avoided	**tonne**	**61,70**	**32,69**
of which preparation for reuse	tonne	0	0
of which recycled	tonne	19,72	18,34
of which other recovery processes	tonne	41,98	14,35
Total quantity of waste for which disposal was avoided	**tonne**	**73,928**	**33,412**
Total quantity of hazardous waste sent for disposal	tonne	5,998	5,888
of which incineration	tonne	5,998	5,888
of which storage	tonne	0	0
including other disposal processes	tonne	0	0
Total quantity of non-hazardous waste sent for disposal	tonne	0,004	0,006
of which incineration	tonne	0,004	0,006
of which storage	tonne	0	0
including other disposal processes	tonne	0	0
Total quantity of waste sent for disposal	**tonne**	**6,002**	**5,894**
Total amount of waste	tonne	**79,930**	**39,306**
Total amount of hazardous waste	tonne	**18,228**	**6,609**
Total quantity of non-hazardous waste	tonne	**61,702**	**32,697**
Total quantity of radioactive waste	tonne	**0**	**0**
Total amount of non-recycled waste	tonne	**49,79**	**20,96**
Percentage of waste not recycled	%	**62,3**	**53,3**

**The types and quantities of waste generated by Polish companies were determined on the basis of data collected in the BDO register, whilst information on how the waste was managed was provided by the companies responsible for waste collection and treatment. For companies in France, the DACH region and the USA, information on the quantity and type of waste was obtained from invoices issued by service providers. Data on other foreign companies has not yet been collected. The Comarch*

Group is currently analysing the possibility of expanding the scope of the information collected and plans to implement appropriate reporting mechanisms in subsequent reporting periods.

*** The information for 2024 has been updated to include historical data from the DACH region and France.*

The metrics set out above have not been approved by any external body other than the assurance service provider.

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

E5-6

As part of disclosure E5-6, the Comarch Group has availed itself of the exemption provided for in the applicable regulations, introduced by Commission Delegated Regulation (EU) 2025/1416 of 11 July 2025, amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of selected disclosure requirements.

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 persons constituting its own workforce, defined as all persons employed under an employment contract, regardless of the duration of their employment, the position held or the agreed working hours, as well as non-employees, i.e. sole traders with whom cooperation agreements have been concluded, contracts for specific work, as well as those employed under contracts of mandate.

The Comarch Group employs staff in Poland and in over a dozen countries worldwide, mainly under employment contracts. The majority of these employees are IT specialists, including programmers, analysts, consultants and project managers. The Comarch Group also works with self-employed individuals and those providing services on an outsourcing basis – however, the proportion of these forms of collaboration is marginal. The Comarch Group's operations have the greatest impact on directly employed staff.

No areas have been identified within the Comarch Group's operations where there may be a risk of forced labour or child labour. No groups within its workforce have been identified as being particularly vulnerable to risks over which the Comarch Group could exert greater influence.

Significant impacts, risks and opportunities relating to social issues were identified as part of the double materiality analysis and were associated with the Comarch Group's own operations.

The Comarch Group has identified one significant potential negative impact and one actual negative impact. These impacts relate to its own workforce and concern:

1. **Diversity – the under-representation of women in technical and managerial roles**, resulting in a gender imbalance in the workforce. This phenomenon is widespread and systemic – it stems largely from the specific nature of the IT sector and the profile of candidates available on the market. Nevertheless, this impact is considered significant from the perspective of equal opportunities and career progression.

2. **The existence of a pay gap between women and men**, resulting both from differences in gender representation in higher-paid technical roles and from possible differences in the pay structure within individual occupational groups. This impact is widespread. The Comarch Group analyses pay data in order to identify and reduce this gap. This phenomenon does not result from deliberate discrimination, but from market and structural factors. Differences in pay levels stem mainly from women's shorter professional experience in the IT sector and their shorter length of service within the Comarch Group, which results in a lower average salary. In employee groups where women and men have comparable length of service and experience (e.g. in administration), pay levels are equal.

A positive impact on its own employees is achieved by ensuring appropriate terms of employment, including job security, market-rate salaries and access to fringe benefits.

The Comarch Group is currently working on formalising a transition plan to mitigate climate change. From the perspective of the current stage of this work and the available analyses, the Comarch Group does not identify any significant actual or potential impacts on its own workforce that could result from the planned transition towards low-carbon and climate-neutral operations.

A detailed description of the actions having a positive impact is provided in Chapter 8.5. Taking action regarding material impacts on its workforce and applying approaches to manage material risks and capitalise on material opportunities related to its workforce, as well as the effectiveness of these actions.

As part of the double materiality analysis, significant risks and opportunities for the Comarch Group were identified, arising directly from its dependence on high-quality human capital and its impacts on the working environment.

The organisation's primary reliance on the unique expertise of IT specialists gives rise to a risk associated with a potential shortage of human capital and the loss of staff with key know-how. This risk stems from the possibility of highly qualified experts leaving, whose skills are essential for maintaining global competitiveness and ensuring operational continuity. Furthermore, an insufficient number of available staff may result in delays in project delivery and a reduction in the quality of services provided. Conversely, failure to manage identified negative impacts (such as the pay gap or disparities in diversity) could significantly generate reputational risks and hinder the recruitment of new talent from the market.

The analysis also identified an opportunity in the form of increased staff engagement. This stems from building an organisational culture based on a sense of purpose, which strengthens staff loyalty to the company and reduces their propensity to change jobs. High engagement acts as a natural barrier to staff turnover, safeguards intellectual capital and reinforces the company's image as a stable and responsible employer. Another opportunity identified is the improvement in service standards through the enhancement of staff skills. This opportunity stems from the direct correlation between the technical expertise of staff and the organisation's ability to deliver innovative and reliable solutions that meet the growing demands of the market. Improving staff qualifications is not merely a developmental benefit, but a strategic mechanism for building a competitive advantage, enabling the transition from simple operational services to the role of a highly specialised technology partner.

8.2. Policies related to own workforce

S1-1

Working conditions

Within the Comarch Group, the rules governing the organisation of work and the rights and obligations of employers and employees are set out in: *the Work Regulations* and *the Remote Working Regulations*. These regulations have been drawn up in accordance with the provisions of the Labour Code and apply to all persons employed under an employment contract. The Work Regulations apply to all Polish companies and selected foreign companies, which together account for 97% of total employment within the Comarch Group. The Remote Work Regulations apply to the majority of Polish and foreign companies, which together also account for 97% of total employment within the Comarch Group.

The Employment Regulations and the Remote Working Regulations enable the management of key aspects relating to working conditions, covering issues such as working hours, job security and work-life balance. These regulations have been drawn up in accordance with national labour law and comply with internal organisational standards.

The aim of the adopted Regulations is to ensure lawful, safe, fair and transparent working conditions that support a work-life balance and enhance employees' wellbeing, as well as to manage the Comarch Group's impact on its own workforce in accordance with applicable legislation and internal standards.

The scope of the documents covers, amongst other things: the organisation of working time, the procedure for justifying absences, remuneration and bonus schemes, rules on the use of leave, obligations relating to health and safety at work, the protection of personal data, and respect for the principle of equal treatment and parental rights .

The rules set out in the Regulations are implemented by formally familiarising staff with their content during the onboarding process, through ongoing training (including on health and safety and personal data protection), and by providing electronic access to the documents via the staff intranet. The HR departments and the managers of organisational units are responsible for the implementation of and compliance with these rules.

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

The effectiveness of the implementation of the rules set out in the Regulations is monitored, amongst other things, through an analysis of turnover rates, absence rates, the number of reported breaches and the results of employee satisfaction surveys.

Fair pay

The Comarch Group's Employee Remuneration Regulations set out salaries and other work-related benefits, as well as the rules governing their award. These Regulations, drawn up in accordance with the provisions of the Labour Code, apply to all persons employed under 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 90% of total employment within the Comarch Group.

The scope of the regulations covers information relating to basic pay, changes to pay, bonus schemes, pay during leave, pay during temporary incapacity for work, deductions, retirement or disability severance pay, expenses and special allowances.

The content of the Regulations contributes to the management of key aspects relating to ensuring adequate pay, gender equality and equal pay for work of equal value. The aim of the Regulations is to apply consistent, transparent and non-discriminatory remuneration principles that support the elimination of the pay gap and the implementation of fair treatment principles, thereby contributing to the strengthening of equal opportunities in the workplace and increasing employees' trust in the remuneration system.

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

All decisions regarding employee remuneration are taken by the management boards of the individual companies within the Comarch Group, whilst the HR departments provide clarification on behalf of the employer regarding the application of the applicable regulations. The regulations are made available to employees via internal systems and discussed during onboarding, and employees are guaranteed constant access to their current content.

The highest level within the organisation responsible for implementing the Remuneration Regulations is the Management Board of the relevant company belonging to the Comarch Group.

The effectiveness of the remuneration system is monitored, amongst other things, through an analysis of 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 form the foundation of the organisational culture. This document serves as a code of conduct for Comarch Group employees in their dealings with colleagues, line managers, clients, partners and local communities, in both business and non-business contexts.

The Code aims to foster an organisational culture based on ethical and moral values, to build trust both within the organisation and in relations with clients, business partners and the local and international community, and to ensure compliance with applicable regulations, legal provisions, recognised international norms and standards – such as the UN Guiding Principles on Business and Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises – and to act in accordance with ethical standards within the Comarch Group's operations.

Key areas of impact covered by the Code of Ethics include:

1. **Employment security** – The Comarch Group's Code of Ethics supports the creation of a stable and secure working environment in which employees' rights, applicable labour laws and international labour and human rights standards are respected. In accordance with the Code, the Comarch Group ensures fair terms of employment, regular payment of wages, compliance with health and safety regulations, and protection against unfair dismissal, which helps to build mutual trust and employee loyalty towards the organisation.

2. **Prevention of violence and harassment in the workplace** – The Code establishes standards of ethical conduct that foster a culture of mutual respect and non-discrimination. As a normative document, it forms the basis for preventing incidents of harassment, verbal abuse or bullying, whilst supporting a system for reporting and responding to unethical behaviour.

3. **Diversity** – by promoting equal treatment and respect for employees' differing views, backgrounds and identities, the Code supports initiatives to increase diversity in the workplace and build an inclusive organisational culture.

4. **Social dialogue** – The Comarch Group's Code of Ethics recognises employees' right to freedom of association and to engage in collective representation. In accordance with the Code, the Comarch Group "engages in dialogue with elected employee representative councils".

The Code of Ethics applies to all companies within the Comarch Group and applies to all employees, regardless of their position or the nature of their contract. Every employee, contractor and representative of the Comarch Group is required to familiarise themselves with and comply with the principles set out in the Code of Ethics. This forms part of the training made available in electronic form as part of the Integrated Management System training programme, which is compulsory for all Polish Comarch employees and is renewed every five years. The training concludes with a compulsory examination, which enables the knowledge acquired by employees on the topics covered in the training to be monitored on an ongoing basis.

The Code of Ethics is a public document and is made available to employees via the intranet and through information campaigns run by the Internet and Internal Communications Department. It is also promoted by the Quality Department and the Compliance and Internal Audit Department. Employees are familiarised with its content during onboarding and training sessions. Activities promoting ethics, such as information campaigns, training sessions 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 in English: https://www.comarch.com/company/code-of-conduct/

The responsibilities of the Compliance and Internal Audit Department include, amongst others:

- supporting staff in complying with the Code of Ethics,
- promoting the principles of the Code of Ethics within the Comarch Group,
- updating the content of the Code of Ethics.

The highest level within the organisation responsible for implementing the Code of Ethics is the Management Board of Comarch S.A.

The principles set out in the Code of Ethics are subject to regular assessment, and its content is periodically reviewed and updated. Employees have the opportunity to raise comments and issues regarding interpretation, which are considered by the Compliance and Internal Audit Department.

Diversity

The aim of the Diversity Policy at Comarch Group is to actively promote an organisational culture based on respect, inclusion and equal opportunities, whilst combating all forms of discrimination. The policy aims to create an open and prejudice-free working environment and to support diversity amongst all employees, management staff, as well as members of the management and supervisory bodies.

The policy promotes an open and inclusive working environment, free from barriers and prejudice. The policy sets out the Comarch Group's commitment to ensuring a balanced representation of women and men in management and supervisory roles within individual companies. The document, available at , contains statistics on the representation of women and men in the management of the Comarch Group, as well as data on the gender pay gap.

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

The highest level within the organisation responsible for implementing the Diversity Policy is the Management Board of Comarch S.A.

Implementation of the policy is monitored, amongst other things, through an analysis of the employment structure – including the representation of women and men at various organisational levels – promotion rates, access to training, and complaints and reports concerning breaches of the principle of equality. The results of this monitoring are used to identify areas requiring improvement.

Training and skills development

The Comarch Group does not have a formally implemented separate training policy – the process of developing employees' skills is carried out in accordance with the current training procedure. The Comarch Group's training procedure is closely linked to the company's strategy and is based on the continuous improvement of employees' professional qualifications through various forms of training, such as classroom-based and distance learning (e-learning). The aim of the procedure is to set out the rules governing the enhancement of employees' qualifications through various forms of training, as well as to support the development of employees' professional competencies and to adapt their qualifications to the organisation's changing technological and strategic requirements. The procedure defines the rules according to which Comarch Group employees may enhance their professional qualifications.

This procedure applies to employees employed under employment contracts or civil law contracts in the Comarch Group's Polish companies. Training courses are organised both internally by the Training Centre and by external providers. Assessment of the knowledge acquired takes the form of examinations, which are conducted directly by technology providers or independent examination bodies.

The Training Centre is responsible for implementing the procedure and its operational execution. The analysis of training needs rests primarily with the managers of organisational units. Training courses are tailored to the individual requirements of roles and career development paths.

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

The effectiveness of the procedure's implementation is assessed by analysing training participation rates, certification exam results, progress in the training application, and employees' professional performance. Findings from this monitoring are used to update and improve the training programme, with a view to adapting it to the Comarch Group's changing competence requirements and strategic objectives. The procedure is subject to periodic review to ensure it remains up to date and aligned with the organisation's strategy.

Health and Safety at Work

The Integrated Management System comprises procedures and instructions applied across all Comarch Group companies and to all forms of employment. The IMS is subject to periodic external audits exclusively at Comarch S.A. to maintain certification. It is described in detail in Chapter E1-1.

A consistent and comprehensive approach to occupational health and safety management is set out in the Health and Safety Policy, developed as part of the IMS Policy, the scope of which includes:

- the prevention of accidents and occupational diseases by ensuring safe and healthy working conditions, as well as eliminating hazards and reducing the risks associated with them,
- compliance with legal and other requirements relating to health and safety at work,
- incorporating health and safety issues into the organisation's vision, mission and strategic objectives, thereby increasing their influence on the company's organisational culture,
- to increase senior management's commitment to health and safety issues,
- consulting and involving employees or their representatives in health and safety activities,
- managing the risks and opportunities arising from the operation of the health and safety management system, as well as its continuous improvement.

Senior management, i.e. the Management Board, is responsible for the strategic oversight of the IMS Policy, whilst the Health and Safety Department, in collaboration with the Quality Department, the HR Department, the Administration Department and other operational business units, is responsible for its day-to-day implementation, monitoring and development.

The IMS Policy is available to stakeholders on internal and external websites, and is also sent by email upon request.

Implementation of the policy is monitored through:

- internal audits (carried out by internal auditors in accordance with the agreed schedule) and external audits (carried out annually by an external accreditation body – in 2025, this was the Polish Centre for Testing and Certification S.A.) as part of the existing Integrated Management System, the purpose of which is to assess the effectiveness and compliance of the implemented management systems (including ISO 45001) with the requirements, to identify areas for improvement, and to ensure that the system operates in accordance with its objectives and regulations,
- an annual Health and Safety Status Analysis,
- a register of incidents, including accidents at work and near-misses, as well as occupational diseases and suspected cases thereof,
- ongoing verification of compliance with legal provisions and regulatory requirements,
- taking into account employees' suggestions regarding health and safety and workplace ergonomics.

Personnel policy

The main objective of the Comarch Group's Human Resources Policy is the strategic management of human resources to support the company's development and success, build a strong, values-based organisational culture, and ensure the development and engagement of employees.

The HR Policy sets out the Comarch Group's strategy in the area of human resources management. It describes the role of the HR department, investment in employees, measures to enhance the efficiency of global projects, and remuneration principles. It emphasises the importance of human capital to the Comarch Group's success, investment in skills development, and the creation of a safe working environment. The HR Policy also outlines the structure of HR functions, including the role of HR Partners and HR Departments in Poland and abroad, as well as initiatives relating to recruitment, employer branding and collaboration with universities. The policy also emphasises the importance of ethical conduct, health and safety at work, human rights and a healthy work-life balance for employees.

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

Strategic oversight is the responsibility of senior management, i.e. the Management Board, whilst the implementation and coordination of the HR Policy are the responsibility of the HR teams in the individual companies of the Comarch Group, under the supervision of central HR and with the involvement of HR Partners.

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

The effectiveness of the policy is assessed through:

- staff turnover and retention rates,
- levels of employee engagement and satisfaction (surveys),
- analysis of the achievement of development and training objectives,
- the results of recruitment and employer branding processes,
- regular reviews of the policy in light of the organisation's changing needs, market trends and regulatory requirements.

Key areas of impact covered by the HR Policy include:

Fair 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.

Employment 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 upheld. The Comarch Group is committed to ensuring the safety and well-being of its employees as part of its Integrated Management System. Ongoing efforts are made to improve working conditions in accordance with health and safety requirements, and high standards in this area are confirmed, amongst other things, by a certificate compliant with the PN-EN ISO 45001 standard.

<u>Respect for human rights</u>

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

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

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

The policy on the Group's own workforce forms an integral part of the Code of Ethics. The Code has been approved at the highest level of the organisation. It is based on the knowledge and experience accumulated within the Comarch Group and sets out expectations regarding human rights for its own workforce and business partners. The Code is publicly available on the Comarch website.

The Comarch Group is committed to respecting human rights, including the labour rights of its own workforce. In this regard, the Code of Ethics covers 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 addresses compliance with the prohibition of human trafficking, forced labour and child labour.

In the area of equal treatment and social inclusion, the Comarch Group implements measures through its Diversity Policy, which includes a commitment to eliminating all forms of discrimination, including harassment, and to promoting equal opportunities. This document takes into account diversity in terms of: gender, age, national and ethnic origin, sexual orientation, gender identity, disability, religion, political views and other characteristics protected by national and EU law.

The Comarch Group is also committed to positive action to support the integration of people at risk of exclusion, including, amongst others, women in leadership roles and people with disabilities. These policies are implemented through an onboarding system, regular training, awareness campaigns, as well as mechanisms for reporting irregularities and consulting with the Compliance and Internal Audit Department.

Compliance with these principles is monitored through internal control mechanisms, a system for reporting unethical behaviour, the analysis of reports, and periodic policy reviews. These processes support the identification of potential breaches and the implementation of appropriate corrective measures, as well as the ongoing monitoring of risks related to the observance of human rights and labour rights within the Comarch Group.

The Comarch Group has an accident prevention policy (described above in the section on health and safety) and an accident management system (the measures 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 engaging with its workforce. Various organisational units are responsible for communication and engagement with staff in accordance with their respective remits, in particular: the Human Resources Department and the Quality Department. At the operational level, responsibility for engaging with staff lies directly with the managers and directors in charge of their respective organisational units. The process of engaging with staff is based on direct communication and taking staff views into account in operational decision-making. In addition, employees may express their opinions and put forward proposals through Employee Representatives, who are elected in a democratic process every two years, most recently in March 2026.

The process of collaboration with employees covers issues relating to the Comarch Group's identified significant impacts in the area of working conditions.

The Comarch Group involves employees in key stages of decision-making and processes affecting working conditions. This applies, amongst other things, to regulatory matters such as the selection of the managing body for Employee Capital Plans, the introduction of hybrid working, changes to the remote working policy, regulations concerning sobriety checks in the workplace, and consultations on changes to healthcare and the employee benefits package.

The effectiveness and transparency of these processes are monitored on an ongoing basis through the analysis of questions, requests and feedback submitted by employees to the relevant internal departments.

In addition, employee engagement is also fostered through annual performance reviews and anonymous surveys, which enable employees to ask questions. Feedback provided by employees is treated as an important source of information that enables management to make day-to-day decisions.

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

In 2025, the Comarch Group's activities in this regard 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 operations on its own workforce through established processes enabling its own employees to raise concerns or express their needs.

Processes to address the negative impacts within the Comarch Group focus on issues relating to the pay gap and the employment structure, including the proportion of women in technical and managerial roles. In order to reduce any potential disparities, the Comarch Group monitors pay for work of equal value and implements measures to ensure equal opportunities in career development.

In particular, the Group operates the following mechanisms and communication channels:

- **Anonymous channels for reporting breaches**, including discrimination, as described in detail in Chapter G1-1, enabling employees to report irregularities,
- **A periodic review** carried out at least once a year, during which employees have the opportunity to express their views, raise any concerns or identify development needs,
- **Exit interviews**, conducted with employees leaving the organisation, to identify areas for improvement,
- **Ongoing dialogue and consultation with employee representatives**, enabling them to raise comments and suggestions regarding working conditions, benefits and regulations, and ensuring that employees' views are taken into account in operational decision-making,
- **The opportunity to raise concerns directly with line managers**, particularly in the event of irregularities relating to employment or working conditions,
- **Dedicated email channels** for specific areas, such as Health and Safety, Quality and Security, managed directly by staff in the relevant departments.

Employees are informed of the existence of these reporting channels via email and the intranet, as well as during the onboarding process and training sessions on the Integrated Management System.

Staff awareness of the available reporting channels and their trust in the mechanisms for reporting irregularities are assessed indirectly as part of compliance system reviews and an analysis of the number and nature of incoming reports. An increase in the number of reports is interpreted as one of the indicators of increased staff confidence in the existing and continuously improved reporting processes.

At the same time, the Comarch Group carries out information, education and training activities aimed at raising employees' awareness of the available reporting channels and the rules for using them. In 2025, the Comarch Group did not identify any of the reported incidents as constituting a case of discrimination.

The Comarch Group has a mechanism for handling complaints on employment matters, as described in Chapter G1-1. In addition to the procedures for reporting irregularities in the area of employment and the Anti-Discrimination and Anti-Bullying Policy, this also includes a comprehensive mechanism for the protection of whistleblowers (in accordance with the Act of 14 June 2024), which guarantees whistleblowers full confidentiality and protection against retaliatory measures.

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

Given the large scale of its operations and the number of employees, the Comarch Group has a significant impact on the working environment and conditions. At the same time, due to the specific nature of the technology sector – which has traditionally been characterised by a predominance of male employees – ensuring equal treatment and equal opportunities for all team members has become a key area of responsibility. This relationship was confirmed by the results of a materiality assessment, which demonstrated that the Comarch Group has a significant impact on almost every issue relating to its own workforce.

The Comarch Group identifies the measures necessary to manage actual and potential negative impacts on its own workforce by utilising the results of opinion surveys, information gathered during meetings with employees, and feedback received through the organisation's internal communication channels.

The scope of implementation of individual measures may vary between companies within the Comarch Group, taking into account local legal and organisational conditions as well as the scale of their operations. Key policies and procedures apply across all Comarch Group companies in Poland and in the majority of overseas companies. Training activities are carried out across the entire Comarch Group, whilst team-building and employee engagement initiatives are organised primarily in companies based in Poland, although selected activities of this type are also conducted in other Comarch Group companies.

Employment security

The key measures implemented by the Comarch Group are aimed at ensuring stable and attractive working conditions for employees. At Comarch S.A. and across the Comarch Group, employment contracts are the predominant form of employment. The duration of the contract depends on 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 balance work with education or the performance of temporary tasks. The Comarch Group monitors staff turnover – data is collected in both quantitative (turnover rate) and qualitative terms (reasons for leaving), and the results are analysed by the HR departments. All the measures described relate to the company's own staff, are ongoing in nature, and are implemented as part of a long-term human capital management strategy. The expected outcome of these measures is a reduction in the voluntary turnover rate, an increase in employee satisfaction and greater stability within the teams delivering projects for clients. The method for tracking and assessing the effectiveness of these measures is set out in section S1-6.

The Comarch Group has not identified any significant adverse impacts on employment security .

Working time

With regard to the organisation of working hours, the Comarch Group implements solutions that enable flexible working arrangements tailored to employees' individual needs, through remote working on selected days of the week, flexible start times and technological support, including secure VPN connections and assistance from IT teams with hardware configuration and resolving day-to-day technical issues, enabling tasks to be carried out effectively outside the office. The vast majority of companies have remote working policies in place, allowing employees to work outside the office in accordance with arrangements agreed with their employer. For roles requiring on-site presence, policies are in place that take into account the specific nature of the work. Within the Comarch Group, in accordance with the Work Regulations, a task-based working time system is in force. In this model, the key priority is the completion of assigned duties, rather than a strict timeframe for their completion.

The arrangements described apply to the Group's own employees, i.e. those on employment contracts; they were in place during the reporting year and form a permanent feature of the organisational model, which the Comarch Group plans to continue and develop in the coming years. The method of tracking and assessing the effectiveness of these measures includes, amongst other things, an analysis of the level of remote working, employee satisfaction surveys and the monitoring of absence and turnover rates. Details regarding monitoring are set out in Chapter S1-6.

Adequate wages

The level of remuneration is determined by the employer through negotiation with the employee, taking into account the pay levels of employees in similar roles with comparable qualifications and performance. The employer takes into account the employee's performance appraisal, which provides regular feedback on the targets achieved. The employer periodically reviews salary levels for specific roles by comparing them with the labour market.

The Comarch Group also offers its employees a system of non-wage benefits and perks, which complement the remuneration package. In 2025, the Comarch Group developed a new non-wage benefits scheme, which came into effect in February 2026. The programme responds to the evolving needs of the team and is based on two pillars: a flexi-benefits scheme and healthcare packages. The benefits system was designed as a dynamic benefits management process, with the aim of updating the offering in line with employees' expectations.

In addition, in 2025, employees were able to use Multisport cards, access the sports and leisure facilities at the Recreation Centre in Kraków, and benefit from a discount scheme covering, amongst other things, cultural events and insurance products.

The measures described apply to the Group's own employees, i.e. those employed under an employment contract, unless otherwise stated, and were implemented during the reporting year; they will continue in subsequent years as a permanent feature of the Comarch Group's approach to managing employee remuneration and wellbeing.

The method for monitoring and assessing the effectiveness of these measures is set out in section S1-10.

Social dialogue

At Comarch S.A., Employee Representatives have been appointed, who operate in accordance with the Act of 7 April 2006 on informing and consulting employees and the agreement concluded in Kraków on 24 May 2006 between Comarch S.A. and representatives of all Comarch S.A. employees.

Employee Representatives are elected from amongst all employees employed under an employment contract. The election is held by the Company's employees every two years. The last election took place in March 2026. The elected Employee Representatives sit on accident investigation teams and take part in consultations conducted by the Employer, as well as in Health and Safety Committees. Among the most significant of these were consultations regarding the selection of the managing body for the Employee Capital Plans (PPK) (2019), the company's operating principles and working arrangements during the pandemic (2020), changes to the work regulations in connection with the introduction of hybrid working and the abolition of the compulsory 30-minute break during working hours (2021), consultations on amendments to the Labour Code concerning remote working and sobriety checks in the workplace, as well as on amendments to the remote working regulations (2023), and consultations on changes to medical care for employees (2024). In 2025, employee representatives were involved in consultations on HR policy and, in accordance with the requirements of the Whistleblower Protection Act, on procedures for internal reporting and reporting of legal breaches. Another key element of the dialogue with employees was their direct influence on shaping the non-wage benefits package – as part of the consultations, employee representatives selected a new benefits package.

Dialogue with employees also takes place through:

- anonymous surveys, which allow employees to freely express their opinions, make suggestions and ask questions, including during regularly organised Q&A sessions,
- meetings between members of the management board and employees from specific sectors, organised periodically in the form of information and dialogue sessions, both in person and online. Their aim is to provide direct information on the Comarch Group's strategy, financial results, key projects and planned organisational changes, as well as to enable employees to ask questions and express their views. These meetings take place at least once a year or when significant changes are being implemented,
- internal communication is conducted via the Intranet and regular email updates, which include, amongst other things, information on the Comarch Group's current activities and initiatives, organisational changes, available benefits, career development opportunities, as well as company events and ESG-related activities. Communications are published every two weeks or as required by operational needs, whilst the intranet serves as a constantly updated source of information for staff.

Health and Safety

To ensure uniform standards in the field of occupational health and safety, Comarch Group entities 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 aimed at verifying its compliance with the standard's requirements and ensuring continuous improvement.

At Comarch S.A., in accordance with the requirements of the ISO 45001 standard in the area of Occupational Health and Safety (OHS), the following measures were taken in 2025:

- equipping workstations with equipment designed to improve the ergonomics of computer-based work, i.e. *standing desks* and chairs tailored to the employee's anthropometric characteristics,
- monitoring and implementing the recommendations and guidelines of scientific and research bodies in the fields of health and safety at work, workplace ergonomics, environmental protection and fire safety,
- promoting principles relating to health and safety, workplace ergonomics, environmental protection and fire safety, including as part of the First Step programme aimed at new recruits and through articles published on internal websites (e.g. rules for safe cycling, safe practices when moving around the office and its surroundings), organising blood donation drives and DKMS campaigns.

As part of promoting a healthy lifestyle, the following were also organised:

- webinars on physical and mental health as part of the 'Find Your Balance' series, featuring specialists in fields such as psychology and nutrition,
- regular health-promoting activities organised for staff in Kraków – including 'Healthy Body' exercise classes and yoga sessions, held on company premises and tailored to the needs of office workers.

In addition, in 2025, Comarch S.A. promoted a healthy lifestyle by:

- encouraging staff to take part in sporting activities, including runs and marathons,
- joining the 'Cycle to Work' campaign organised by the Department of Municipal Services and Climate at Kraków City Council (from 1 April 2025 to 30 June 2025 and from 1 September 2025 to 30 November 2025) which promotes cycling as the ideal means of getting around the city, both in terms of environmental sustainability and health (the campaign is aimed at people working in Kraków),

- organising the ComarchONbike/ONrun! challenge – by cycling as part of ComarchONbike and running as part of ComarchONrun, the company will provide financial support to a charity chosen by employees through a vote.

All the above activities are ongoing, and their implementation is planned for the short term (the current year) and the medium term (annual review and update of programmes). At this stage, no formal analyses have been carried out to examine the direct impact of these activities on employees.

The method for monitoring and evaluating the effectiveness of these activities is set out in section S1-14.

Training and skills development

With regard to the development of professional competencies, the Comarch Group continues its policy of supporting the education and upskilling of its employees. A programme of work placements and internships for university students and graduates is also being systematically developed. The Comarch Training Centre plays a key role in the skills development system, offering specialist training as well as IT and business consultancy at every level of proficiency, both through in-house training courses for Comarch Group employees and through courses offered to a wide range of external clients. The Comarch Training Centre draws on the Comarch Group's nearly 30 years of experience as a knowledge-based organisation. The wide range of training courses for Comarch Group employees includes, amongst other things, training in soft skills such as effective communication, assertive customer service and managing emotions in the workplace, as well as management training and courses dedicated to project management. The programme also includes technical and industry-specific courses, including dedicated AI training for every employee, designed to develop knowledge in the areas of processes, tools and technologies used in day-to-day work. Thanks to the remote training format, employees can take part in sessions regardless of their location.

Competence development activities were carried out during the reporting year; they are ongoing and form part of the Comarch Group's long-term approach to supporting the development of human capital. These activities are scheduled to continue in the coming years. The expected outcome is an increase in staff qualifications, a better alignment of competencies with project needs, and improved business efficiency.

The method for monitoring and evaluating the effectiveness of these activities is set out in section S1-13.

Measures against violence and harassment in the workplace

Measures implemented to prevent violence and harassment at work are based on the current Code of Ethics, which defines the organisation's core values and standards of conduct applicable to all employees, regardless of their position. The measures implemented within the Comarch Group in 2025 are preventative in nature and include providing access to educational materials, presentations and compulsory training courses posted on internal platforms, aimed at raising awareness and promoting attitudes consistent with the organisation's values.

The Comarch Group also operates mechanisms enabling the anonymous and secure reporting of potential breaches. Employees have access to dedicated channels for reporting irregularities, which are described in sections S1-3 and G1-1. The formal Anti-Discrimination and Anti-Bullying Policy was implemented within the Comarch Group in the first half of 2025.

All the above measures are ongoing and are planned for implementation in the short term (this year) and the medium term (regular reviews of content, training and assessments of the effectiveness of reporting mechanisms).

The method for monitoring and evaluating the effectiveness of these measures is set out in sections S1-3, S1-13 and G1-1 and includes, amongst other things, an analysis of the number of reports, the completion rate for compulsory training, an assessment of the level of trust in reporting channels, and a review of the effectiveness of corrective actions.

Diversity

As part of measures aimed at eliminating identified disparities, in 2025 a compulsory e-learning course entitled ‘Equality at work – combating discrimination and workplace bullying’ was conducted for employees of the Comarch Group’s Polish companies. Furthermore, in 2026, the Comarch Group took part for the second time in the TECH HER WAY conference dedicated to promoting the IT sector amongst women. The aim of participating in the conference was to showcase career paths and support diversity within the technology sector. The initiative took the form of a local industry event targeting the local community and potential employees, which helped to build a pool of female candidates for technical roles and promote the Comarch Group’s inclusive organisational culture.

The following initiatives are planned for the coming years:

- to continue promoting diversity, including through internal communications and employer branding initiatives, with a view to raising awareness and engaging staff in creating an inclusive working environment,
- in the longer medium-term (2026–2028), launching development and leadership programmes for women, aimed at strengthening their skills and preparing them to take on managerial roles.

The phased measures outlined above cover all employees of the Comarch Group and are designed to systematically increase the level of diversity within the Comarch Group, with a particular focus on increasing the representation of women in managerial and specialist roles. These measures are designed to eliminate structural and cultural barriers that may limit equal opportunities in career development, and also aim to create an inclusive, fair working environment in which all employees — regardless of gender — have equal access to opportunities for development and promotion.

Work-life balance

In 2025, the Comarch Group undertook measures aimed at supporting the health, wellbeing and work-life balance of its employees. These initiatives are implemented on an ongoing and systematic basis, taking into account the needs of different employee groups:

- flexible working arrangements, such as hybrid working and flexible start and finish times,
- the introduction of psychological and health support programmes, including, for example, access to specialist consultations (both through the Group’s own imed24 Medical Centre and as part of a medical package),
- organising health workshops and campaigns aimed at raising awareness of preventive healthcare,
- promoting team-building groups and activities to foster teamwork (e.g. sports-related events organised by the EB team, ‘two hours for the family’ – the option to finish work early),

- private healthcare 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 initiatives in the area of work-life balance is to sustainably improve employees' well-being by implementing solutions that enable flexible working arrangements, promoting a healthy lifestyle, and supporting family relationships and team integration. The scope of these initiatives covers all companies within the Comarch Group and applies to all employees on permanent contracts. These measures are of a permanent nature and will be implemented on an ongoing basis in the coming years.

Gender equality and equal pay for work of equal value

The Comarch Group, recognising that a persistent pay gap may, in the long term, have a negative impact on equal opportunities, organisational culture and stakeholders' perception of the company, is taking steps to reduce this phenomenon and strengthen the principles of equal treatment.

Current initiatives:

- annual monitoring of indicators and reporting on progress within the ESG framework.

Planned activities for the coming years:

- organising training for employees and management on diversity and combating prejudice.

The aim of the Comarch Group's planned activities is to systematically reduce the gender pay gap and strengthen the principles of equal treatment throughout the organisation. The scope of the activities covers all entities of the Comarch Group and applies to employees at all organisational levels. The implementation of these measures is planned for the coming years and will be an ongoing process, with an annual assessment of the results and the possibility of updating the objectives based on the monitoring findings.

In 2025, the Comarch Group's activities relating to managing the impact on its own workforce were carried out as part of standard operational activities and did not require significant, dedicated resources from staff or financial resources (separately allocated CapEx or OpEx budgets). During the reporting period, no dedicated quantitative studies were conducted to assess the impact of these activities on employees' working conditions. No studies were carried out to assess the impact of these activities on their working conditions. Nor were any measures taken to mitigate the negative effects on its own workforce resulting from the transition to a more environmentally friendly, climate-neutral economy.

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

S1-5

The percentage of staff who have completed dedicated AI training has been set as a key target in the area of staff training and skills development.

As part of the implementation of the global 'AI First' strategy, the Comarch Group has set a target that, by 1 July 2026, 100% of the Comarch Group's own workforce will have obtained a certificate of completion for the first level of the 'AI Academy' programme, starting from a baseline of zero in 2025.

The target was set top-down by the Management Board as part of the Comarch Group's key technology strategy and was not subject to prior consultation with external or internal stakeholders, including Employee Representatives, during the process of defining it.

With regard to other significant impacts, risks and opportunities relating to its own workforce, the Comarch Group did not set any formal, measurable quantitative targets for 2025. Management of these areas is based on the implementation of strategic directions.

These directions are set out in the document 'ESG Strategy Assumptions and Objectives' and are integrated into the Comarch Group's Code of Ethics, Diversity Policy and HR Policy.

The strategic directions apply to all Comarch Group employees, regardless of their location, form of employment or position held. They cover areas such as: working conditions, professional development, equality and diversity, health, social relations, and the prevention of discrimination and workplace bullying.

The Comarch Group's main strategic direction in the social sphere is to create an attractive, safe and equitable working environment that supports the professional and personal development of employees, whilst also strengthening the company's positive impact on the wider community.

In the area of social responsibility, the Comarch Group has set out the following strategic priorities:

- **Continuous improvement of working conditions and increasing opportunities for employees' professional development**, including through access to training, development programmes and healthcare,
- **Promoting diversity and equality**, including by supporting the professional development of women and striving to achieve a proportion of women in managerial roles 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 grounds of race, skin colour, origin, or national or ethnic origin, which is intended to undermine an employee's ability to exercise their rights to equal standing in the workplace,
- **The effective implementation of an anti-bullying policy**, encompassing both preventive measures and a transparent mechanism for reporting and responding to incidents.

Progress in implementing the above strategic priorities will be monitored using measurable indicators, such as: staff turnover, the proportion of women in management roles, the number of training sessions, reports under the anti-bullying policy, and the level of involvement in social and charitable activities.

Progress in implementing the strategic priorities is monitored on a regular basis by the Personnel, HR and ESG departments, without the direct involvement of employee representatives in this process, and the results are presented in the annual Sustainability Report. Targets may be updated in response to changing organisational and regulatory conditions, as well as the results of impact assessments and dialogue with stakeholders.

Furthermore, as a signatory to the United Nations Global Compact, the Comarch Group anticipates the possibility of updating its adopted targets in order to integrate them more fully with the UNGC's Ten Principles and the 2030 Agenda for Sustainable Development.

8.7. Characteristics of the undertaking's employees

Number of employees

S1-6

As at 31 December 2025, the Comarch Group employed 3,963 staff in Poland and 525 outside Poland.

All employment data presented in disclosure S1-6 is derived from internal HR systems and is stated as the number of employees as at 31 December 2025, unless otherwise indicated. The measurement of the metrics presented below has not been approved by an external body other than the assurance service provider.

In the course of its operations, the Comarch Group adjusts its headcount to meet the needs associated with project delivery.

The number of employees (number of individuals) broken down by gender for the Comarch Group is presented below.

Comarch Group	Number of employees	
Gender	**2025**	**2024**
Male	2 942	3 546
Women	1 546	1 852
Other	-	-
Not reported	-	-
Total staff	**4 488**	**5 398**

Staff turnover

In 2025, staff turnover within the Comarch Group remained in line with previous years.

Staff turnover at the Comarch Group in 2024 and 2025 was as follows:

Year	Total number of employees who left the organisation during the reporting period	Rotation rate*
2025	747	15,22%
2024	660	12,43%

*The staff rotation rate was calculated as the ratio of the number of departures during the period analysed to the average headcount for the reporting period. Average headcount was calculated as the arithmetic mean of the number of employees at the beginning and end of the year – i.e. as at 1 January 2025 and 31 December 2025.

The number of departures includes all employees who ceased their employment with the Comarch Group during the reporting period, regardless of the reason (including: voluntary resignations, termination of contracts by mutual agreement, dismissals by the employer and expiry of contracts).

Contracts under which work is performed

The tables below show the number of people employed by the Comarch Group at the end of 2025, broken down by the type of contract under which work is performed. The data is sourced from internal HR systems.

FEMALE	MALE	OTHER	NOT DISCLOSED	TOTAL
2025				
Number of employees				
1 546	**2 942**	-	-	**4 488**
Number of employees on fixed-term contracts				
505	**940**	-	-	**1 445**
Number of employees on permanent contracts				
1 041	**2 002**	-	-	**3 043**
Number of employees whose hours are not guaranteed				
0	**0**	-	-	**0**
Number of full-time employees				
1 415	**2 894**	-	-	**4 309**
Number of part-time employees				
131	**48**	-	-	**179**
2024				
FEMALE	**MALE**	**OTHER**	**NOT DISCLOSED**	**TOTAL**
Number of employees				
1 852	**3 546**	-	-	**5 398**
Number of employees on fixed-term contracts				
719	**1 280**	-	-	**1 999**
Number of employees on permanent contracts				
1 133	**2 266**	-	-	**3 399**
Number of employees whose hours are not guaranteed				
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 table below shows the number of persons employed by the Comarch Group who constitute the Group's own workforce at the end of each year in the period 2024–2025, by type of employment. All employment data presented in disclosure S1-7 is derived from internal HR systems and is stated as the number of employees as at 31 December 2025, unless otherwise indicated. The measurement of this indicator has not been validated by an external body other than the assurance service provider.

Comarch Group Type of employment	Gender	2025	2024
Contract of mandate	Female	88	168
	Male	247	579
	Others	0	-
	Not disclosed	0	-

	Total	**335**	**747**
Cooperation agreement	Female	83	0
	Male	302	19
	Others	0	-
	Not disclosed	0	-
	Total	**385**	**19**
	Total	**720**	**766**

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. At Comarch S.A., Employee Representatives have been appointed, who operate in accordance with the Act of 7 April 2006 on informing and consulting employees and the agreement concluded in Kraków on 24 May 2006 between Comarch S.A. and representatives of all Comarch S.A. employees. Employee Representatives are elected from among all employees employed under an employment contract. The election is held by the Company's employees every two years. The last election took place in March 2026.

Employees of the other Polish subsidiaries have not expressed a wish to appoint their own 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 in establishments with employee representatives to the total number of employees employed by the Comarch Group.

In the Comarch Group's foreign companies in the DACH region, there are no trade unions, but works councils do operate. The election of a works council is not mandatory, and the decision is made by the employees. Eligibility to vote is restricted by length of service.

Works councils in the DACH region:

- Comarch Solutions GmbH – Innsbruck; this company is also covered by a collective agreement,
- Comarch AG – the company has a central works council, and local works councils also operate in most locations.

Works councils also operate in the French companies, namely Comarch S.A.S. and Comarch R&D S.A.S.

At Comarch SRL in Italy, there are no trade unions, but employees are covered by the national collective labour agreement (CCNL – *Contratti Collettivi Nazionali di Lavoro*), which was established to regulate relations between employees and employers. It is collective because it applies to all employees in the sector covered by the agreement, and national because it applies to all companies located within Italy. It regulates the employment relationship, for example, working hours, qualifications and duties, remuneration, etc.

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

In Brazil, the trade union operates as an organisation outside the company. By the end of 2025, all employees were members of this union.

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

8.10. Diversity metrics

S1-9

The employment structure within the Comarch Group is based on four basic pay grades, which reflect the diversity of employees' roles and scope of responsibility: management, administrative staff, production staff and other support roles.

Within the Comarch Group, senior management is defined as individuals holding managerial positions up to the fourth level below the Management Board. The table below shows the breakdown by gender for the years 2024–2025.

The data presented is sourced from internal HR systems and is reported as at 31 December 2025. The measurement of the indicators presented below has not been approved by an external body other than the assurance service provider.

2025		
Comarch Group	**Senior management**	**% of employees**
Female	201	32%
Male	437	68%
Total	**638**	**100%**
2024		
Comarch Group	**Senior management**	**% of employees**
Female	211	29%
Male	520	71%
Total	**731**	**100%**

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

Comarch Group	2025				
Employee categories	**Female**	**Male**	**Others**	**Not disclosed**	**Total**
over 50	100	233	-	-	333
30–50 years	1 054	1 806	-	-	2 860
under 30	392	903	-	-	1 295
Total	**1 546**	**2 942**	**-**	**-**	**4 488**
Comarch Group	**2024**				
Employee categories	**Female**	**Male**	**Others**	**Not disclosed**	**Total**
over 50	109	268	-	-	377
30–50 years	1 244	2 141	-	-	3 385
under 30	499	1,137	-	-	1 636
Total	**1 852**	**3 546**	**-**	**-**	**5 398**

8.11. Adequate wages

S1-10

In 2025, all employees employed under an employment contract at Comarch S.A. and within the Comarch Group received remuneration equal to or higher than the minimum wage calculated on a full-time basis .

8.12. Social protection

S1-11

All Comarch Group employees employed under an employment contract are covered by the compulsory social security system, which provides replacement income in the event of significant life risks, such as illness, an accident at work, the onset of disability, parental leave and retirement. This system operates on the basis of public social security schemes in Poland and in other countries where the Comarch Group operates, financed by contributions from both the employer and the employee.

With regard to unemployment, the Comarch Group makes use of the deferral of disclosure in the first year of preparing the sustainability report, in accordance with Appendix C to ESRS 1.

The scope of benefits includes, amongst others, sickness benefits, rehabilitation benefits, maternity and paternity benefits, disability pensions and old-age pensions. These benefits are available to all employees covered by social insurance, regardless of their position or level of remuneration.

In accordance with current legislation, the companies Comarch S.A., iComarch24 S.A., CA Consulting S.A., Comarch Infrastruktura S.A., Comarch Finance Connect Sp. z o.o., Comarch Cloud S.A. and Wszystko.pl sp. z o.o. have implemented Employee Capital Plans, which are managed by the Allianz Specialised Open-Ended PPK Investment Fund, managed by Towarzystwo Funduszy Inwestycyjnych Allianz Polska Spółka Akcyjna. Employees of the Comarch Group's foreign companies participate in pension schemes in accordance with local legal requirements.

In the Comarch Group's Polish companies, supplementary healthcare packages are a benefit available to employees on employment contracts (regardless of the contract duration or working hours). In the Comarch Group's foreign companies, supplementary healthcare packages are provided where the standard of publicly available healthcare is low, taking into account local regulations and market practices in this regard, as part of the benefits scheme.

8.13. Training and skills development metrics

S1-13

The tables below show the average number of training hours per employee by gender for those employed under an employment contract in 2025. The data is sourced from the internal training system. The measurement of the indicators presented below has not been validated by an external body other than the certification service provider.

Comarch Group	Average number of training hours per employee [h]	
	2025	2024
Female	29,24	16,85
Male	33,56	21,10
Total	**32,07**	**19,64**

In 2025, 2,207 interviews were conducted out of 3,223 periodic surveys generated, which translates to a response rate of 68%. In 2024, the response rate was 63%, with 2 966 interviews out of 4 672 surveys generated.

The subject of the periodic appraisal with an employee is their work performance, understood as the employee's achievements during the period of employment subject to review and assessment. The employee's professional development is also discussed during the periodic appraisal.

At this stage, the Comarch Group does not have the technical capability to collect data broken down by gender. In the future, the introduction of system improvements enabling such reporting is being considered.

8.14. Health and safety metrics

S1-14

Data on health and safety at work covers employees within the Comarch Group. Internal health and safety procedures apply to this group, including risk assessment, training and monitoring of working conditions. Due to the lack of a legal basis, health and safety indicators do not cover external contractors or persons employed under outsourcing arrangements.

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

Occupational Health and Safety, Comarch Group	2025	2024
Percentage of employees covered by the occupational health and safety management system	**100%**	100%
Number of reportable cases of work-related ill health	**0**	0
Number of days lost due to work-related injuries	**41 days**	86 days

Number of fatalities resulting from work-related accidents and from work-related ill health, and fatalities resulting from ill health and work-related injuries	**0**	0
Number of minor accidents	**6**	4
Number of serious accidents	**0**	0
Number of fatal accidents	**0**	0
Number of mass accidents	**0**	0
Accident rate	**0,67**	0,37*

**The workplace accident rate for employees was calculated in accordance with the ESRS S1-14 standard: the number of accidents divided by the number of hours worked by employees, multiplied by 1,000,000. The number of hours worked by employees was determined on the basis that each employee worked 8 hours per day, and that there were 250 working days in 2025 and 251 working days in 2024.*

8.15. Work-life balance metrics

S1-15

The table below presents data on the percentage of employees who took leave for family reasons in 2024 and 2025.

Comarch Group	2025				2024			
	Female	Male	Others	Not disclosed	Female	Male	Others	Not disclosed
Percentage of employees entitled to family leave*	100%	100%	-	-	100%	100%	-	-
Percentage of eligible employees who took leave for family reasons	24,38%	10,74%	-	-	25,87%	11,14%	-	-

**Employees entitled to family leave are all Comarch Group employees in accordance with national legislation.*

The percentage of employees entitled to family leave was calculated as the ratio of the number of employees meeting the formal conditions for taking a given type of leave to the total number of employees employed under an employment contract within the Comarch Group.

The source data is derived from the Comarch Group companies' HR and payroll systems and internal HR databases. The measurement of the indicators presented has not been approved by any external body other than the assurance service provider.

8.16. Compensation metrics (pay gap and total compensation)

S1-16

In accordance with the Remuneration Regulations, an employee is entitled to a basic salary for performing work for the employer. The amount of remuneration is determined by the employer through negotiation with the employee, taking into account the remuneration levels of employees in similar roles with comparable qualifications and performance. The employer takes into account the employee's performance appraisal, which provides regular feedback on the achievement of objectives. The employer periodically reviews pay levels for specific roles by comparing them with the labour market.

The Remuneration Policy establishes the principle of equal treatment in relation to pay, according to which gender is not a criterion for determining pay, and decisions in this regard are based on objective factors such as the scope of duties, responsibilities, qualifications and work performance. Remuneration is not determined by gender, but by objective criteria for assessing work performance and the duties and responsibilities associated with the post held.

The table below shows the ratio of the average pay for women to the average pay for men in 2024 and 2025.

	Comarch Group	
	2025	2024
Gender Pay Gap (%)	**18,52**	**19,35**

The gross pay gap ratio between men and women in the Comarch Group 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 pay gap ratio between women and men in the Comarch Group was calculated as a weighted average of the ratio for Polish companies and representative subsidiaries with the highest number of employees (accounting for a total of 45% of the workforce in foreign companies, and having representation in every employee category); the weights used were the levels of employment in Polish companies and in individual foreign companies. This approach stems from the fact that it is impossible to take direct account of pay levels in different countries due to significant variations in the factors influencing pay – such as differing currencies and varying pay levels in different locations around the world.

The average pay for women at Comarch S.A. and within the Comarch Group is lower than the average pay for men. This is mainly due to the fact that female employees have less experience in the IT sector and a shorter length of service within the Comarch Group, which affects pay levels. In the group of employees where industry experience and length of service are similar for women and men (administration), salary levels are comparable.

The CEO Pay Ratio figures for the Comarch Group are presented below.

	Comarch Group	
	2025	2024
CEO Pay Ratio	51,8	51,2

The CEO Pay Ratio was calculated as the ratio of the annual total gross remuneration of the highest-paid individual in the entity to the median of the annual total gross remuneration of all employees employed under an employment contract (excluding that individual). Within the Comarch Group, the ratio was calculated as the weighted average of the ratio for Polish companies and representative subsidiaries with the highest number of employees (accounting for a total of 43% of the workforce in foreign companies); the weights used were the number of employees in Polish companies and in individual foreign companies. This approach stems from the fact that it is impossible to directly take into account salary levels in different countries due to significant variations in the factors influencing remuneration – such as differing currencies and varying salary levels across different locations worldwide.

The above source data is derived from the HR and payroll systems of Comarch Group companies and internal HR databases. The measurement of the indicators presented has not been validated by any external body other than the assurance service provider.

8.17. Incidents, complaints and severe human rights impacts

S1-17

According to the records kept, in 2025, four reports of breaches of ethical principles were recorded via the Whiblo channel, leading to investigations being carried out. In the course of these investigations, it was not found that any of the reported incidents constituted a case of discrimination or a serious violation of human rights.

Incidents and complaints	2025	2024
Total number of confirmed cases of discrimination, including harassment in the workplace	0	0
Total amount of fines, penalties and compensation for damages resulting from incidents and complaints	0	0
Number of **serious** human rights incidents relating to the organisation's workforce, including those reported to national contact points for the OECD Guidelines	0	0
Total amount of fines, penalties and compensation for damages resulting from **serious** incidents and complaints concerning respect for human rights	0	0

The data is taken from the breach register maintained by the Compliance and Internal Audit Department. The measurement of the indicators presented has not been approved by an external body other than the assurance service 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, which forms an integral part of its business model, focused on combining technological excellence with work based on commitment and values.

The Comarch Group operates on the principle that responsible business is not just about financial results, but also about a genuine concern for people, communities and the natural environment. Therefore, as part of its efforts to improve operational efficiency and implement the objectives of *the Value Creation Plan*, the Comarch Group consistently engages in initiatives that create lasting value for the communities and the environment of which it is a part.

As part of the materiality assessment process carried out, the Comarch Group did not identify any material financial risks or significant market opportunities in this area. The strategic link to the business model is realised solely through generating the significant positive impact on the social environment described below.

As part of its activities in support of sport, a key area of the Comarch Group's social engagement is its support for KS Cracovia S.A. – the oldest sports club in Kraków, which competes in professional football and ice hockey leagues. Despite the sale of its shares in August 2025, the Comarch Group remains committed to the club's development as its main sponsor. Through its partnership with KS Cracovia S.A., a range of initiatives aimed at local communities, including children and young people, are carried out – such as tournaments, educational campaigns, social events and charitable activities. These activities enhance access to sporting activities and promote a healthy lifestyle.

The scope covers local communities living, in particular, in areas where the Comarch Group's offices and sports facilities are located, including communities living in the immediate vicinity of sports infrastructure in Kraków and other cities where the Comarch Group operates. The impact also extends to residents of these cities who take part in events, sporting activities and social programmes organised by KS Cracovia S.A. and other companies within the Comarch Group.

The second pillar of the Comarch Group's social activities is the promotion of knowledge regarding 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 small teams under the supervision of experienced specialists, carrying out tasks related to modern technologies, applications and databases. Following the summer programme, over 80% of the interns were employed by Comarch on terms that allow them to balance their work with their university studies.

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

The third area of the Comarch Group's social engagement is supporting local communities through the sponsorship of cultural festivals, concerts and events of significant social importance.

The Comarch Group supports a diverse range of beneficiary groups through charitable activities, sponsorship and corporate social responsibility (CSR) initiatives, including environmental organisations, educational institutions, cancer foundations, charitable organisations, sports clubs and the cultural sector.

Activities that have a significant positive impact are described in section S3-4.

9.2. Policies related to affected communities

S3-1

Within the Comarch Group, the strategic approach to relations with the wider community is governed by the Code of Ethics , which addresses the Comarch Group's significant positive impact, i.e. social engagement, including social and charitable activities. In accordance with the Code, one of the elements of "the Comarch Group's social activities is supporting initiatives for the benefit of local communities, in particular through: sponsoring cultural festivals, concerts or events of significant social importance". Information regarding the Code, including details on its description, general objectives, scope and the highest level of management responsible for its implementation, is set out in Chapter G1-1.

The Comarch Group has not adopted a separate policy on respect for human rights. Issues relating to this area are set out in the Code of Ethics, of which the provisions concerning affected communities (contained in Chapters 1, 2 and 10) form an integral part. A description of the document's compliance with widely recognised international standards, including the UN Guiding Principles on Business and Human Rights, is set out in Chapter S1-1.

The Comarch Group does not have a policy on preventing and mitigating impacts on indigenous peoples. According to the results of the double materiality analysis carried out, the Comarch Group's own operations have a significant, positive impact on local communities; however, this does not include communities classified as indigenous peoples.

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 relating to affected communities were identified in the Group's own operations or value chain.

9.3. Processes for engaging with affected communities about impacts

S3-2

Engagement 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, amongst other things, by regularly analysing reports at and requests for support, which may originate both from internal initiatives – submitted by employees or entities within the Comarch Group – as well as from external sources – submitted by institutions, organisations or private individuals.

The frequency of activities is tailored to the specific nature of individual initiatives and the expectations of beneficiaries.

Feedback from local communities is gathered as part of the analysis of submissions and ongoing communication. Based on the information collected, the Employer Branding team assesses the merits of providing support and prepares recommendations for the Management Board, which makes the final decision on whether to grant support and in what form.

In cases where proposals for cooperation are submitted directly to the Management Board, the assessment of the merits and the decision on support are made directly at Management Board level, bypassing the assessment stage by the Employer Branding team.

Cooperation 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 nature of their needs and social circumstances.

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

The Comarch Group assesses the effectiveness of its cooperation with beneficiaries on the basis of feedback received regarding the support provided and its impact on the activities of the supported organisations. The assistance provided takes the form of both in-kind and financial support, and is analysed on a case-by-case basis in terms of its appropriateness and effectiveness. The assessment takes into account both the effectiveness of the use of the funds provided and the alignment of the beneficiaries' activities with the Comarch 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 currently have dedicated mechanisms in place enabling local communities to directly raise comments, concerns or needs, and, as at the date of this report, no decision has been taken to formally implement such mechanisms. However, interested parties may contact the company via the publicly available contact details on the Comarch Group's website 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 actions taken during the reporting year in relation to the Comarch Group's significant positive impact (social engagement, including social and charitable activities):

Promoting science and education

– Active cooperation with schools and universities:

AGH University of Science and Technology in Kraków

- Signing of a strategic agreement with the AGH University of Science and Technology in Kraków, aimed at developing joint research and educational projects in the field of information and communications technology.
- Cooperation with Cracovia Football Club covering the implementation of technological innovations and data analysis in sport, digitalisation using artificial intelligence, and an internship programme for students wishing to gain experience in managing a professional football club.

Wrocław University of Technology

- Mentoring: during the 12th Team Projects Conference, our experts acted as mentors, supporting students in developing innovations in the fields of AI and medical technologies.

Lublin University of Technology

- Sponsor and content partner at the third edition of the 'Entrepreneurial Student' festival. Preparation of a case study on artificial intelligence for participants.

Poznań University of Economics

- Regular support for the university's students, helping them to combine economic knowledge with the practical challenges of modern business.

Politecnico di Milano

- Renewed partnership with the university on the B2B Observatory project as part of international cooperation.

Support for the fight against disease and the promotion of health

- Support for Luxembourg-based foundations working to combat cancer (Fondation Cancer and Fondatioun Kriibskrank Kanner) through participation in the "Rock Against Cancer" charity concert.
- Support for the Małopolska Children's Hospice as part of the "Precious Kilometres" challenge, where kilometres run or cycled were converted into financial support.

As part of efforts to promote health and prevention, free mammography screenings were organised before the Cracovia v Radomiak Radom match, carried out in collaboration with LUX MED Diagnostyka. At the same time, the Comarch Group is committed to promoting blood donation and the registration of bone marrow donors. As part of campaigns organised in Katowice and Kraków, a total of over 36 litres of blood was collected, helping nearly 250 patients. The Kraków blood drive also offered the opportunity to join the DKMS Foundation's donor registry, giving people with blood cancers a chance of survival.

Charitable work and helping those in need

- Supporting the Great Orchestra of Christmas Charity (WOŚP) by acting as a strategic partner for the 34th Grand Finale in Kraków and actively engaging in the fundraising campaign's objective, which was to support the diagnosis and treatment of gastrointestinal diseases in children.
- Supporting charitable initiatives such as the nationwide Christmas fundraising campaign for children's homes, hospices and foundations, and providing financial support to the Małopolska Children's Hospice as part of the 'Precious Kilometres' sporting campaign.
- Donation of several hundred items of computer equipment to schools and foundations.

Sponsoring sport and engaging with local sporting communities

- Sponsorship of the Polish ski mountaineer and Himalayan climber Andrzej Bargiel during the Everest Ski Challenge 2025 expedition.
- Sponsorship of sports clubs: KS Cracovia and the top-flight football club Royal Unions Saint-Gilloise.
- Collaboration with Cracovia supporters' clubs and associations, organising joint initiatives and events to integrate the club with the local community in Kraków and Małopolska.
- Establishment, as part of the Cracovia Academy, of the 'Pasiaste Motyle' (Striped Butterflies) team for children with intellectual disabilities, aimed at integration and equal opportunities.

Support for culture

- Sponsorship of cultural events, such as Simon Höfele's concert as part of the 'Stars with Sinfonietta' series and the New Year's show featuring Sinfonietta Cracovia & Lee Reynolds. Acting as a patron of cultural events, such as the 'Last Night of The Proms In Cracow' concert at the Kraków Philharmonic.

Thanks to the support of our partners, concert tickets were offered at affordable prices, enabling a wider audience to attend.

Promoting an active lifestyle

- Participation by employees from various Comarch branches in running events in Poland and abroad, including charity events such as the Poland Business Run, 'Daj Piątaka na Dzieciaka' and the cross-country run organised by **Lycée Itec in La Tronche**, as well as other running events across Poland, including the Independence Run in Warsaw, Gdańsk, Poznań, Białystok and Rzeszów, the Lublin Half Marathon, the Marceliński Spring Run, and the 'Run with a Whistle for Health'.

- Organising educational campaigns, such as #PasiastaWizyta and #PasyZWiedzą, in schools to promote physical activity and a healthy lifestyle.

Expected outcomes: improving the 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 Comarch 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, which have an impact on the affected communities.

Timeframe: the activities carried out by the Comarch Group are ongoing and are adapted to the current needs and circumstances of the individual people and organisations receiving support.

The method for monitoring and evaluating the effectiveness of the activities is described in section 9.3.

Resources allocated to social and charitable engagement: human resources, financial resources.

In 2025, the Comarch Group made donations to social causes totalling PLN 44,000, with the largest recipients being the Great Orchestra of Christmas Charity Foundation as part of the 33rd Grand Finale and the Małopolska Children's Hospice. Furthermore, as in the previous year, the Comarch Group responded to social needs on an ongoing basis, donating over 140 items of electronic equipment (computers, laptops and monitors) required for teaching to schools and public benefit organisations.

The table below shows the total amount of donations made by the Comarch Group to charitable causes between 2024 and 2025.

in thousands of PLN	2025	2024
Comarch Group	44	110
the largest recipients	*33rd Grand Finale of the Great Orchestra of Christmas Charity (WOŚP)* *Małopolska Children's Hospice*	*Hochschule für Technik und Wirtschaft – HTW Dresden, Technische Universität Dresden*

The table below shows the total amount spent on sponsorship by the Comarch Group in 2024–2025.

in thousands of PLN	2025	2024
Comarch Group	9 479	7 538
Largest sponsored partners	*KS Cracovia SA* *Cracovia Hokej sp. z o.o.*	*KS Cracovia SA* *Royale Union Saint-Gilloise Football Club*

Comarch Group employees are also involved in numerous charitable initiatives (such as volunteering, fundraising for those in need, and charity runs).

In 2025, no serious human rights issues or incidents relating to the affected communities were reported.

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

S3-5

In 2025, the Comarch Group did not set any measurable, results-oriented targets relating to material positive impacts.

The Comarch Group monitors the effectiveness of the measures it takes, as described in section 9.3.

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

- Addressing important social issues through dialogue with local communities, supporting sport and promoting a healthy lifestyle, undertaking initiatives in the fields of culture and education, and popularising science,
- Providing financial assistance to those in need and supporting charitable initiatives.

The Comarch Group plans to set measurable, results-oriented targets for 2026.

Corporate governance

10. Corporate culture and business practices

10.1. Corporate culture and business conduct policies and corporate culture

G1-1

Since its inception, the Comarch Group has consistently built, developed, promoted and evaluated an organisational culture based on a system of values, within which the Group strives, amongst other things, to:

- continuously and systematically ensuring the quality and competitiveness of the products and services it offers,
- tailoring products and services to customers' expectations and requirements,
- developing mutually beneficial cooperation with suppliers in order to improve the quality of the products and services offered,
- maintaining a high level of care regarding the confidentiality and security of the information and data processed,
- continuously improving staff qualifications through an appropriate education system and training programmes focused on issues relating to quality, information security, environmental protection, energy management and health and safety at work,
- fostering awareness of quality, environmental issues, energy management, health and safety at work, and information security amongst staff,
- ensuring safe and healthy working conditions in order to prevent accidents at work, occupational diseases and near-miss incidents,
- involving employee representatives in consultations on measures that have a significant impact on working conditions,
- taking active measures to minimise negative environmental impacts, improve energy efficiency and reduce the carbon footprint associated with the company's operations,
- complying with applicable legal and other requirements relevant to the organisation,
- continuously improving the effectiveness of the Integrated Management System, including AQAP 2110 and AQAP 2210,
- supporting initiatives related to sustainable development and corporate social responsibility.

The Comarch Group's organisational culture is based on values such as openness, commitment, innovation, quality and social responsibility. These values are enshrined in the Comarch Group's Code of Ethics.

The main documents and procedures in force within the Comarch Group relating to the Group's significant positive impact on corporate culture, and aimed at ensuring respect for human rights and ethical principles throughout the value chain, are:

- Comarch Group Code of Ethics,
- Sustainable 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,
- Compliance Policy,
- Anti-Bullying and Anti-Discrimination Policy,
- Internal Procedure for Reporting Compliance Breaches (Compliance Procedure),
- Counterparty Due Diligence Policy.

The Comarch Group and the Group companies legally obliged to do so have in place procedures for reporting breaches of the law:

✓ Internal procedure for reporting breaches of the law in accordance with the Act of 14 June 2024 on the protection of whistleblowers,

✓ Procedures established pursuant to the Act of 1 March 2018 on the prevention of money laundering and terrorist financing, applicable at Comarch S.A. and iComarch24 S.A.

Code of Ethics

Under the Code of Ethics, described in detail in Chapter S1-1, the Comarch Group undertakes, amongst other things, to:

- comply with international human rights standards and international labour standards,
- adhering to the principles of fair competition, and preventing bribery, illegal payments and corruption.

This Code is a direct response to the impacts identified during the materiality assessment process in the areas of corporate culture and the prevention of corruption and bribery. In accordance with the principles of the Code, corporate governance forms the foundation of responsible business for the Comarch Group. It encompasses not only management in accordance with the law, but also conduct based on ethical principles and industry standards, including the implementation of a transparent and reliable reporting policy.

Oversight of the Code of Ethics is exercised by the Management Board, which is responsible for approving its content and accepting any amendments made.

The following risks have been identified within the framework of the Code of Ethics for the purposes of developing the principles set out in the Code of Ethics:

- the risk of breaching the principles of ethics, corporate responsibility, respect for human rights and environmental protection,
- the risk of discrimination in all its forms,
- the risk of non-compliance with principles relating to fair competition, the prevention of bribery, illegal payments and corruption,

- the risk of non-compliance with legal requirements, international standards on human rights and labour standards, and internal procedures relating to ethics.

Comarch S.A. has a **Compliance and Internal Audit Department**, which operates as a separate unit responsible, amongst other things, for ensuring compliance with legal provisions, internal control, risk management and internal audit. At present, due to the absence of statutory requirements and the ongoing process of profound transformation within the Comarch Group, the internal audit function is not carried out within the Company. Nevertheless, day-to-day control functions are effectively carried out as part of compliance and quality management activities. The full implementation of a dedicated audit function is planned once the current transformation process has been completed and the situation has stabilised.

The unit's main tasks are:

- to support the organisation in minimising the risk of non-compliance with the law, internal regulations and ethical and moral standards,
- enabling the identification of risks that may affect the achievement of the organisation's business objectives and ensuring these risks are managed appropriately,
- assessing the effectiveness of the organisation's internal control and risk management systems.

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

The responsibilities of the Compliance and Internal Audit Department include, amongst other things:

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

Sustainable Policy for Suppliers

The Sustainability Policy for Suppliers sets out the key principles that the Comarch Group follows when working with business partners. Furthermore, this document constitutes a commitment to pursuing a sustainable procurement policy and sets out expectations for key suppliers, including, amongst other things, compliance with human rights. The implemented policy enables the management of positive impact in the area of supplier relations, which has been identified as a key factor in the materiality assessment process. This document has been drawn up on the basis of recognised international standards, including the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

The policy sets out the following principles for cooperation with suppliers: supporting and encouraging adherence to the principles of ethics, social responsibility and environmental protection; ensuring high-quality products and services whilst taking health and safety principles into account; building a good partnership based on the principles of cooperation, trust and integrity; operating in compliance with the law; selecting suitable suppliers capable of ensuring high quality and good labour standards, environmental protection, business ethics and care for local communities. In accordance with the Policy, the Comarch Group requires that a supplier:

- implement environmental management principles in accordance with ISO 14001 or a similar standard;
- implement health and safety management principles compliant with ISO 45001 or a similar standard;

- adhere to good business practices typical of the supplier's field of activity;
- operate in accordance with the law;
- respect employees' right to organise;
- refrains from employing children under the age of 16;
- does not use corporal punishment or any other degrading or inhuman treatment, and does not resort to forced labour.

The Comarch Group's Sustainability Policy for Suppliers applies globally and covers 100% of direct suppliers of goods and services, regardless of their geographical location or the value of the contract. The highest level within the organisation responsible for implementing the Policy is the Company's Management Board.

Anti-Corruption Policy

The Anti-Corruption Policy, implemented within the Comarch Group, is a set of binding rules and standards of conduct aimed at preventing and responding to actions that may constitute corruption. The Anti-Corruption Policy sets out the procedure to be followed in the event of a corruption risk or behaviour exhibiting signs of corruption. The implemented Policy is a key tool for strengthening the positive impact in the area of combating corruption and bribery, as identified in the materiality assessment process. It complements national and international legislation on anti-corruption, and the obligation to comply with these provisions rests with every employee, contractor and representative of the Comarch Group.

The adopted Anti-Corruption Policy sets out the principles which all employees, associates and representatives of the Comarch Group are obliged to adhere to, namely:

- transparency of operations and zero tolerance for corruption,

- compliance with national and international law, taking into account the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the United Nations Convention against Corruption, and the Council of Europe Criminal Law Convention on Corruption. Entities within the Comarch Group, in countries where local anti-corruption regulations apply, such as the US Foreign Corrupt Practices Act (FCPA) or the UK Bribery Act, ensure compliance with and application of such local regulations.

In order to prevent breaches of procedures and standards relating to the prevention of corruption and bribery, every employee, associate and representative of the Comarch Group is required to familiarise themselves with the anti-corruption principles in force within the Comarch Group, as well as to undertake training on the Anti-Corruption Policy and the Comarch Group's Anti-Corruption Guidelines, which are presented as part of the training on the Integrated Management System; this training is mandatory for all Comarch Group employees every five years. Furthermore, the Anti-Corruption Policy is available on the intranet and on the Comarch SA website.

The Policy is supplemented by **the Comarch Group's Anti-Corruption Guidelines**, which set out detailed rules of conduct for employees, associates and representatives of the Comarch Group, aimed at preventing the occurrence of corruption risks and responding to any instances of corruption. In order to effectively monitor and detect breaches, the Comarch Group provides secure and confidential channels for reporting irregularities, guaranteeing full protection for whistleblowers against retaliation or discrimination.

As part of best practice in the field of anti-corruption, the following risks have been identified for the purposes of developing the principles set out in the Anti-Corruption Policy:

- the risk associated with non-compliance with rules on fair competition, the prevention of bribery, illegal payments and corruption,
- the risk of a conflict of interest in the course of business,
- the risk of job loss, the imposition of financial penalties and reporting to law enforcement authorities,
- the risk of illegal benefits being provided to employees, business partners or other third parties (including public officials and representatives of political parties),
- the risk of non-compliance with legal requirements and internal procedures relating to anti-corruption policies.

No final convictions have been handed down against Comarch S.A. or the companies of the Comarch Group in relation to human rights, corruption, unfair competition or taxation.

The highest level within the organisation responsible for implementing the Anti-Corruption Policy is the Company's Management Board. Enforcement of the Policy is based on the principle of absolute accountability – any confirmed breach of anti-corruption rules results in immediate disciplinary or legal consequences.

Diversity Policy

Detailed information regarding the Diversity Policy can be found in section S1-1.

Risk Management Procedure

The Risk Management Procedure applies to organisational units within the Comarch Group for which no more detailed procedures are in place. The procedure stipulates that risk management is a continuous process based on periodic risk analysis, which assists in identifying threats and opportunities, vulnerabilities, recording the security measures implemented, and planning how to deal with risks (mitigation, transfer and/or acceptance). The flowchart of the risk management process is as follows:

(1) risk assessment – this stage involves: risk identification, risk description, measurement of the level of inherent risk, identification of existing risk management mechanisms, and measurement of the level of residual risk;

(2) risk treatment – this stage involves specific steps: proposals for responding to risks, approval of measures by the Management Board, and actions taken in response to risks;

(3) monitoring and reporting;

(4) subsequent iterations of the process.

The risk management process is analysed periodically, at least once a year and following significant organisational, architectural or technical changes in the area under review. The highest level within the organisation responsible for implementing the Risk Management Procedure is the Company's Management Board.

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

This procedure applies, in particular, to reports concerning breaches of the procedures and ethical standards in force within the Comarch Group, covering in particular the provisions of the Comarch Group Code of Ethics, as well as applicable legal provisions relating to ethics. The aim of the procedure is to ensure transparency in the operations of the companies forming part of the Comarch Group and to provide a means of reporting breaches of internal ethical standards and ethical norms arising from statutory provisions. The procedure provides for the possibility of reporting breaches electronically via the Whiblo system, which has been in operation within the Comarch Group since 2022. Reports may be either anonymous or named. Any member of the Comarch Group's staff may make a report, regardless of their basis of employment. The procedure ensures that the personal data of those reporting breaches is protected, in particular the confidentiality of the information. The Compliance and Internal Audit Department is responsible for conducting investigations, recommending solutions and communicating with those reporting breaches. The procedure was formally implemented by a resolution of the Management Board of Comarch S.A. in 2022, and in 2024 it was replaced by a document applicable throughout the Group, regardless of the location of operations, whilst taking into account local legislation. The highest level within the organisation responsible for implementing the Procedure for Reporting Breaches of Procedures and Ethical Standards within the Comarch Group is the Company's Management Board.

Infringement reporting procedures

Employees are entitled to expect assistance and support from staff in the Compliance and Internal Audit Department regarding enquiries submitted in relation to the Whistleblowing Procedure to the dedicated email address:compliance@comarch.pl

Employees, contractors and external parties may submit anonymous reports of any breaches of ethics or non-compliance with regulations or the Comarch Group's applicable compliance procedures via the Whiblo system. The Whiblo system is a whistleblowing channel that enables anonymous reports to be made, along with the option of anonymous two-way communication with the person reporting the breach. At the same time, in 2024, by resolution of the Management Board, in the individual companies of the Comarch Group appropriate procedures were implemented to regulate the rules for making reports, conducting investigations and protecting those who report breachesin accordance with the Whistleblower Protection Act, .

The Whiblo system enables the swift, independent and objective investigation of incidents relating to business conduct, including incidents of corruption and bribery. At the same time, the Comarch Group has a Compliance Procedure in place which provides for the conduct of independent and objective investigations into incidents relating to business conduct, including cases of corruption. The Compliance Procedure was adopted for implementation by a resolution of the Management Board of Comarch S.A. dated 30 April 2025.

Protection of reporters and whistleblowers

The procedures in place within the Comarch Group for reporting breaches guarantee the protection of those who report breaches by ensuring the possibility of making anonymous reports, introducing a ban on retaliatory actions, and restricting access to the information contained in reports to the strict minimum. It is prohibited to disclose the identity of a person making a report without their express consent. Members of the committees examining reports sign appropriate declarations, including those relating to the duty of confidentiality. All actions taken as part of investigative proceedings are carried out with due regard for the privacy of whistleblowers. Retaliatory measures, as well as attempts or threats to take such measures against a whistleblower, are prohibited. Taking retaliatory measures constitutes a serious breach of employment duties. Notwithstanding the above, any person who engages in retaliatory action is subject to the liability set out in the Whistleblower Protection Act.

Procedure for dealing with legal and ethical breaches

All reports are examined by an independent committee and subsequently classified as either substantiated or rejected. The committee comprises Comarch Group employees and impartial individuals possessing the qualifications and experience necessary to conduct an investigation in a thorough and objective manner. Where a report is upheld, appropriate measures are taken to investigate and resolve the matter. According to the register maintained, in 2025 there were 4 reports of breaches of ethical principles, which led to an investigation being carried out. The results of these investigations are reported to the Management Board. In order to continuously improve the skills of staff handling reports, the Comarch Group provides them with external training.

Prohibition of mobbing

As part of the ESG Strategy, one of the objectives set was to effectively implement an anti-bullying policy that defines bullying behaviour and sets out the procedure for reporting incidents of this nature. Consequently, the Comarch Group's Anti-Discrimination and Anti-Harassment Policy was drawn up, which was subsequently approved by the Management Board and adopted for implementation. The implemented Policy is a direct response to the impact identified during the materiality assessment process in the area of measures to prevent violence and harassment in the workplace. The provisions of the Policy apply to all employees, contractors and representatives of the Comarch Group – both in Poland and abroad. In accordance with the principles adopted in 2024, the Comarch Group's Anti-Discrimination and Anti-Harassment Policy was implemented in 2025 and remains in force indefinitely, subject to continuous and systematic updates. The Policy constitutes a set of principles, standards and commitments aimed at ensuring that the activities of the Comarch Group companies comply with applicable national, EU and international law regarding equal treatment and respect for personal dignity. The Policy was not consulted with stakeholders.

The Comarch Group's Anti-Discrimination and Anti-Bullying Policy is a public document; consequently, any interested party may submit their comments and suggestions aimed at improving its substantive provisions.

The Comarch Group's Anti-Discrimination and Anti-Harassment Policy was drawn up and adopted for implementation by a resolution of the Management Board of Comarch S.A. dated 30 April 2025.

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

The Comarch Group's ethical organisational culture is strengthened through information campaigns and training on ethics and compliance with the law. Within the companies of the Comarch Group, in order to continuously raise employees' awareness of the core values applicable within the Comarch Group and the principles concerning, amongst other things, ethics, anti-corruption policy, respect for human rights, the prohibition of discrimination and equal treatment, communications are circulated within the Comarch Group via information channels (email, Intranet). Regular training sessions on these topics are organised internally; they are available to and compulsory for all employees, and information on the Comarch Group's policies is presented to new recruits as part of the 'First Step' induction programme.

The provision of information to the management and supervisory bodies at Comarch S.A. regarding ethics, compliance management and the associated risk factors takes place during regular meetings between the management of the Compliance and Internal Audit Department and the Management Board, whilst the Supervisory Board is informed through annual reports on the functioning of the internal control system, risk management and compliance, as well as sustainable development within the Comarch Group, together with an assessment of their effectiveness, prepared by the Compliance and Internal Audit Department.

Compliance Policy

The principles of the Policy apply to all employees, associates and representatives of the Comarch Group – both in Poland and abroad. In accordance with the principles adopted in 2024, the Comarch Group's Compliance Policy was implemented in 2025 and remains in force indefinitely, subject to continuous and systematic updates. The Policy constitutes a set of principles, standards and commitments aimed at ensuring that the activities of the Comarch Group companies comply with applicable law, ethical norms, quality standards and the principles of sustainable development.

The Comarch Group Compliance Policy is a public document; consequently, any interested party may submit comments and suggestions aimed at improving its substantive provisions.

The Comarch Group's Compliance Policy was drawn up and adopted by a resolution of the Management Board of Comarch S.A. dated 30 April 2025.

Internal procedure for reporting compliance breaches (Compliance Procedure)

The provisions of this Procedure apply to all employees and associates of the Comarch Group. The internal procedure for reporting compliance breaches was implemented in 2025 and remains in force indefinitely, subject to continuous and systematic updates. The purpose of the Procedure is to ensure that all employees and associates of the Comarch Group have the opportunity to report breaches securely, as well as to set out the rules for doing so.

The internal procedure for reporting compliance breaches is available on the intranet; consequently, every employee and associate has the opportunity to submit their comments and suggestions aimed at improving its substantive provisions.

Counterparty Due Diligence Policy

As a global entity, the Comarch Group actively shapes its economic and social environment. A key element of the company's strategy is the Counterparty Due Diligence Policy, which reflects a responsible approach to business relationships. This document, approved by the Management Board of Comarch S.A., applies to all employees and associates of the Comarch Group worldwide.

Any adjustments to the Policy to comply with local law require the approval of the Compliance and Internal Audit Department. In addition, the Comarch Group conducts mandatory annual sanctions training for staff in high-risk roles, and records of these training sessions are kept in a dedicated register maintained 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 international corporations, namely manufacturers of computer hardware and software, as well as electronics related to the development and production of devices. Most orders are fulfilled through purchases from local branches and local distributors. The Comarch Group's operations are not dependent on any single supplier. In 2025, as in the previous year, none of the contractors supplied products or services with a value exceeding 10% of the Comarch Group's sales revenue.

Companies applying for Comarch Group supplier status are asked to complete a questionnaire containing questions on the scope of implemented and certified management systems relating to health and safety at work, social responsibility, environmental protection, energy management and information security. The answers provided in the questionnaire are validated, and the company is then classified by the system into one of four supplier categories. The highest, first category is awarded to those companies that declare compliance with the standards required by the Comarch Group.

In accordance with the supplier assessment procedure, questionnaires are also sent out annually to companies that have completed the questionnaire in previous years, in case suppliers have noted changes within their organisation in the areas covered by the assessment. In 2024, 1,064 questionnaires (including periodic ones) were sent via this platform, which were completed by 34 suppliers. By 31 December 2025, 1,042 questionnaires (including periodic ones) had been sent via this platform, which were completed by 69 suppliers.

In the next stage of the analysis, following the completion of the order, the quality of cooperation is also assessed. The following factors are taken into account: flexibility in problem-solving, the flow of information during the order processing, adherence to delivery/service completion deadlines, compliance of the order with the specification, the quality of the goods/services, and the conformity of the invoice with the agreed terms (price, payment terms). Based on the average assessment of the supplier's performance over the past year, the supplier is assigned one of four categories:

I – selected for cooperation as a first priority,

II – second choice,

III – reserve,

IV – high-risk.

Control and operational supervision of the supplier analysis and evaluation process within the Comarch Group is carried out by the Counterparty Management Department in cooperation with the Logistics Department. The formal and procedural aspects of this area are governed by a procedure drawn up and issued by the Quality Department.

Comarch S.A. does not have a policy aimed at preventing late payments; however, it submits an annual report on payment terms in commercial transactions and does not use unfair terms.

10.3. Prevention and detection of corruption and bribery

G1-3

All rules relating to the prevention of corruption are set out in the Anti-Corruption Policy. The operating principles are described in G1-1. In accordance with the Code of Ethics, Comarch Group employees must not, in either internal or external dealings, offer, grant, promise, demand or accept financial or personal benefits that could be perceived as unlawful, unethical or inappropriate, or which are intended to influence the terms of a transaction. It is forbidden to pay or offer bribes or illegal benefits to public officials or representatives of political parties for the purpose of concluding or maintaining a transaction. Employees of the Comarch Group are obliged 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. Comarch Group employees must not derive any benefit, nor assist others in deriving a benefit, from opportunities that may arise as a result of the use of information or their position within the company.

In the case of KS Cracovia, the obligation to conduct educational activities on the risks of corruption stemmed from the licensing guidelines of the Polish Football Association (PZPN). These covered first-team players and the Academy teams.

These activities were carried out by a person who had previously taken part in centralised training organised as part of the project ‘Countering corruption and match-fixing in football clubs’, run by the Ministry of Sport and Tourism.

Currently, Klub Sportowy Cracovia S.A. is no longer part of the Comarch Group.

In addition, every employee has the opportunity to submit questions, concerns, comments or objections regarding, amongst other things, the Anti-Corruption Policy to the following email address:compliance@comarch.pl . Meanwhile, breaches in this regard may be reported by any employee, as well as, amongst others, suppliers, to the Compliance and Internal Audit Department, either anonymously or by name, via the dedicated breach reporting channel: Whiblo. Each report is assigned a unique reference number for direct communication and is subject to an initial assessment of its validity by the appointed Committee. If the report is deemed valid, impartial members of the Committee, who are bound by confidentiality, conduct an internal investigation to gather and secure evidence. Upon completion of the investigation, a final written report is drawn up and the person making the report receives appropriate feedback. Should a breach be established, the Company’s Management Board, on the basis of the Committee’s recommendations, determines further remedial actions, including, amongst other things, disciplinary measures against the perpetrator or notification of the relevant public authorities.

The Compliance and Internal Audit Department is responsible for identifying areas requiring changes in the field of anti-corruption. The Management Board participates in the process by analysing and approving updates to internal regulations, thereby familiarising itself with their content.

Employees are informed about the available channels and methods for reporting breaches at the start of their employment as part of the onboarding process, and subsequently through regular training on the Integrated Management System, email communications and dedicated information sections on the intranet.

Comarch S.A. does not carry out on-site ethical audits of suppliers; however, as part of its Sustainable Development Policy for Suppliers, it supports and encourages suppliers to conduct their business in accordance with ethical principles and to comply with the anti-corruption standards implemented within the Comarch Group.

The risk of corruption is one of the risks – amongst others – in the Compliance area identified in Comarch S.A.'s Risk Map. Following an analysis of this risk by the Compliance and Internal Audit Departments, it was concluded that the areas most at risk in terms of corruption and bribery include the organisational units responsible for procurement and investment processes. To address these challenges, in 2025 the Comarch Group focused its efforts on stepping up educational programmes and raising staff awareness. A key initiative carried out during the reporting period was an information campaign organised to mark International Anti-Corruption Day under the slogan *'Principles that protect us all'*. As part of this campaign, employees were reminded of the practical operational guidelines and ethical standards in force within the Group, including, amongst others:

- **a zero-tolerance policy** towards any corrupt behaviour,
- **the obligation to register gifts** via a dedicated email address
- **an absolute ban on accepting or giving** cash or cash equivalents (such as gift cards or vouchers) to business partners,
- **ensuring that remain modest in nature**business meetings and trips , so that they unambiguously serve business purposes only and do not go beyond standard market relations.

In order to further and effectively mitigate risks and continuously enhance the organisation's resilience to misconduct, the Company plans to implement regular, annual training programmes tailored to the specific risks faced by teams most vulnerable to corruption, particularly in the procurement and investment departments.

Indicators for anti-corruption training at Comarch S.A.	2025	2024
Number of employees trained (persons)	1 527*	1 302*
Percentage of staff in roles exposed to the risk of corruption (in %)	81,93**	87,91**
Number of trained members of the Management Board and Supervisory Board	3***	3***

* The figure given represents the number of people who completed the training in 2025 out of all Comarch S.A. employees.

**The figure given represents the percentage of individuals in roles exposed to corruption who have completed up-to-date training at Comarch S.A. covering, amongst other things, the Anti-Corruption Policy (19.28% of this group were trained in 2025)

*** The figure given represents the number of people who have completed up-to-date training at Comarch S.A. covering, amongst other things, the Anti-Corruption Policy.

The Management Board is informed by the committees conducting the investigations about reports of breaches, actions taken and proposed solutions.

Information in this regard is also included in the Report to the Supervisory Board, which contains, amongst other things, a description of the functioning of the internal control, risk management, compliance and sustainable development systems, as well as a proposal for measures to be adopted for the coming year.

In the 2025 financial year, the monitoring of compliance processes and the operation of reporting channels confirmed the effectiveness of the adopted principles. No confirmed reports of corruption incidents were received via the Whiblo system or any other communication channels. No legal proceedings were pending or concluded in relation to Comarch S.A. or the companies of the Comarch Group, nor were any final convictions handed down in relation to corruption or bribery.

Targets set for 2026:

1. **Update of the anti-corruption policy, covering in particular new requirements relating to anti-corruption, gifts, conflicts of interest, and sponsorship and donations**

2. **Development of the Comarch Group's Sanctions Procedure and implementation of a sanctions verification service for business partners**

   The purpose of this procedure is to oversee business partners cooperating with companies within the Comarch Group, with regard to verifying their inclusion on applicable national, EU and international sanctions lists. The aim of this procedure is to set out the rules and define the procedure for verifying the Comarch Group's business partners against applicable national, EU and international sanctions lists.

3. **Update of the Business Unit presentation for the purposes of the cyclical onboarding project run by the People sector (First Step)**

4. **Update to the Physical Security Department's procedure regarding the handling of external audits**
   The purpose of updating the procedure will be to clarify the rules governing the organisation, preparation and handling of external inspections carried out within the Comarch Capital Group by authorised bodies or services.
   The aim of the update will be to ensure a uniform, lawful and transparent approach in the event of a visit by external authorities or services authorised to carry out audits within the Comarch Capital Group, by supplementing and elaborating on the existing procedure of the Physical Security Department.

5. Implementation of the ERM system (including an IT tool supporting the risk management process within the organisation).

6. Organising training sessions specifically tailored to the needs of:

   - the Anti-Corruption Policy for individuals particularly vulnerable to the risk of corruption and bribery,

The objectives were not consulted with stakeholders.

10.4. Confirmed incidents of corruption or bribery

G1-4

In 2025, there were no breaches relating to corruption or bribery within the Comarch Group, including:

Incidents of corruption	2025	2024
Number of convictions for breaches of anti-corruption legislation and legislation on combating bribery	0	0
Amount of fines for breaches of anti-corruption legislation and legislation on combating bribery (in PLN)	0,00	0,00
Number of confirmed cases of corruption or bribery	0	0
Number of confirmed cases of dismissal or disciplinary action taken against the organisation's own staff for incidents relating to corruption or bribery	0	0
Number of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to breaches involving corruption or bribery	0	0

A description of the measures taken to address breaches of procedures and standards relating to the prevention of corruption and bribery is set out in sections G1-1 and G1-3.

10.5. Payment practices

G1-6

Comarch applies payment terms that comply with the applicable regulations.

Standard payment terms for suppliers are:

- 14–21 days for small and medium-sized enterprises (SMEs),
- 30–60 days for large enterprises,
- with the possibility of negotiating individual terms in justified cases.

The above terms are based on the contracts entered into and the payment documents issued. At present, the Comarch Group does not categorise suppliers in its records, including by size. There are plans to introduce a system for identifying entities belonging to the SME group in the future.

With regard to small and medium-sized enterprises (SMEs), the Comarch Group takes particular care to ensure that payments are made on time. In the case of suppliers from the SME sector:

- shorter payment terms are preferred (as indicated above: up to 14–21 days),
- the option is offered to agree payment terms in advance, taking into account their financial situation,
- it is the Comarch Group's practice to avoid unilaterally imposing unfavourable commercial terms.

The Comarch Group strives to settle its liabilities to contractors and suppliers on time. Cash flows are monitored regularly to minimise payment delays. The percentage of payments made in accordance with standard payment terms in 2025 was 65,96%.

The average time taken by the Comarch Group to settle an invoice, from the date of issue to the date of payment, is 15,3 days.

In 2025, there were no legal proceedings pending in connection with late payments.

11. Personal data and cybersecurity (specific disclosure)

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

G2-SBM3

As a provider of comprehensive IT solutions for a wide range of industries – including the financial, healthcare, public administration and telecommunications sectors – the Comarch Group processes significant volumes of data, including personal data, some of which is particularly sensitive. Consequently, cybersecurity and the protection of personal data are areas of key importance to the Group's operations, both in terms of their impact on stakeholders and in terms of potential financial and reputational risks.

Within the Comarch Group's structure, cybersecurity and the protection of personal data have been identified as among the most important areas having a direct impact on operational activities and development strategy. As providers of IT solutions, the companies within the Comarch Group act as both data controllers and data processors. This means that the Comarch Group processes data relating to customers and employees, as well as a range of personal data entrusted by customers, which entails a high level of responsibility. Ensuring cybersecurity and the protection of personal data in accordance with applicable regulations and standards has a significant impact on:

- ✓ the company's reputation,
- ✓ customer trust,
- ✓ it enhances the organisation's credibility in the market and builds its positive image,
- ✓ ensuring regulatory compliance, which helps to minimise the risk of heavy financial penalties
- ✓ security, including that of employees, customers and end users, which is so important in an era of digitalisation and a growing number of threats. By implementing high standards of data protection, the Comarch Group is perceived as a more reliable and stable business partner.

Disclosing data in a manner that fails to respect privacy principles may lead to a breach of the rights of data subjects. Cyber threats and potential data breaches may result in a loss of customer trust and a decline in service usage, as well as damage to the company's reputation, which directly affects the organisation's stability.

Widespread digitalisation, the development of modern technologies and their growing importance create a range of opportunities for dynamic growth, whilst simultaneously increasing the level of risk associated with the inappropriate use of these technologies. New vectors of cyber-attacks, which may have serious security implications as well as financial, legal or reputational consequences, mean that cybersecurity within the Comarch Group is a vital element in relation to the company's operations and the rapidly changing environment in which it operates.

In the face of these threats, information and the systems used to process it represent a critical and key asset for the company, both for stable operational functioning and from the perspective of its reputation. The Comarch Group places great emphasis on the protection of data (in particular personal data) and its own assets, as well as those of its clients and 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, there is currently no policy in place within the Comarch Group; however, following the entry into force of Regulation (EU) (EU) 2016/679 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 (GDPR), the Comarch Group has implemented procedures governing the processing of personal data. A general data protection procedure has been adopted, together with procedures governing specific data protection issues within the Comarch Group.

In particular, the procedures describe: the general principles governing the processing of personal data; the fulfilment of the obligations of the data controller and the data processor; data protection impact assessments; security requirements for data processing systems; the rules for granting authorisations to process personal data, the rules for handling requests from data subjects, the rules for remote working, and the rules for dealing with breaches (including personal data breaches).

The procedures are drawn up and updated by the Data Protection Officer's Department and implemented within the Comarch Group following their prior approval by the Management Board of Comarch S.A. The procedures apply to all employees and associates of the Group.

Cybersecurity

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

- The Comarch Group Security Policy, based on the ISO 27001 international security standards, and its accompanying procedures, which cover, amongst other things: organisational matters, raising staff awareness, the physical protection of assets, technical IT security measures, business continuity and response to information security incidents. The primary objective of the Security Policy is to ensure the confidentiality, integrity and availability of the Comarch Group's and its customers' data.
  The principles of the Security Policy apply to all companies within the Comarch Group, taking into account local legal requirements; however, they have been formally implemented at Comarch S.A. and selected subsidiaries of the Group whose management boards have adopted declarations of compliance with this Policy.
  The Policy applies to all employees working in the companies covered by it. Subcontractors and suppliers providing IT and information security services are not directly covered by the Policy; however, prior to establishing a working relationship, contractors are vetted to ensure compliance with information security requirements in accordance with the scope of the collaboration.
  Implementation of the Policy is monitored by the CISO Division, which carries out periodic compliance reviews, security tests, and incident and risk analyses. 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 this review are presented to senior management.

The Management Board of Comarch S.A. is responsible for the implementation, updating and oversight of the Policy; it approves the text of the Policy and oversees its application across the entire Comarch Group. The operational implementation and day-to-day enforcement of the policy fall within the remit of the Chief Information Security Officer, who reports on company-wide matters directly to the Chairman of the Management Board, and on sector-specific matters to the Director of the relevant Sector.

- The procedure for managing information security incidents forms part of the Security Policy and applies to all Group companies that have adopted the Security Policy. The procedure sets out the process for managing incidents within the Comarch Group, including those relating to personal data breaches and cyber-attacks in the broadest sense. The CISO Division is responsible for the implementation, updating and oversight of the procedure.
- The Risk Management Procedure, which sets out the methodology for assessing and managing risks relating to information security, and the Business Continuity Policy, which sets out the principles for ensuring the continuity of services provided and the principles of crisis management in the event of threats.
- The risk management procedure and the Business Continuity Policy are in force across the companies of the Comarch Group and apply to all areas of operation where operational, technological and information risks are identified. The BCM Board is responsible for the implementation, updating and oversight of the Business Continuity Policy.

The Comarch Group monitors the effectiveness of its policies and the technical and organisational measures in place through regular 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 measures relating to personal data protection and cybersecurity that were undertaken during the reporting period and which are planned for implementation in the future. Given the specific nature and critical importance of personal data protection and information security, the measures initiated are ongoing and are implemented on a continuous basis.

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

Operation of the Integrated Management System (IMS). The Comarch Group operates an Integrated Management System (IMS), which is certified at Comarch S.A., whilst the implemented procedures apply across all Group companies. As part of this system, a comprehensive information security system has been implemented – the Information Security Management System (ISMS) based on ISO 27001 standards. The ISMS covers all internal processes supporting the company's operations as well as business processes, and encompasses all the company's assets. As part of this system, security audits of the Comarch Group's internal systems are carried out by a dedicated internal department responsible for security matters. In addition, the organisation undergoes audits conducted by certification bodies. ISO certification. The Group utilises international security standards, such as ISO 27001, which is certified at Comarch S.A., Comarch S.A.S. , and Comarch AG – whilst the implemented policies apply across all Group companies. Guidelines arising from the NIS2 Directive are also applied to ensure that the level of protection for processed data complies with applicable regulations on personal data protection and cybersecurity.

With regard to the protection of personal data, 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 (GDPR), the Comarch Group implements the following measures:

- in companies where such an obligation has arisen, Data Protection Officers have been appointed; they are responsible for ensuring compliance with the provisions of the GDPR, issuing opinions and recommendations regarding personal data, and cooperating with the supervisory authority,
- The Comarch Group applies technical and organisational measures appropriate to the identified risks. These are reviewed and updated on an ongoing basis, at least once a year, to adapt them to changing risks, technological progress and applicable legislation,
- It maintains registers such as: the register of processing activities, the register of processing categories, the register of data breaches and the register of requests, as part of its data processing records and accountability,
- has implemented an internal process for authorising staff to process personal data. Authorisations are granted and revoked via a dedicated system in accordance with our internal procedures,
- as part of its risk management, it carries out risk analyses and Data Protection Impact Assessments (DPIAs),
- in fulfilling its duty to provide information as part of ensuring transparency in the processing of personal data and providing accurate information to data subjects, the Comarch Group has prepared a dedicated information clause covering the main and most common purposes for which personal data is processed and has published it on its website. In addition, separate clauses are drawn up for specific processes. These clauses are tailored to the purpose, legal basis and form of contact (online/offline) and are provided in accordance with the requirements of the GDPR;
- as part of our staff's education and awareness-raising efforts, training sessions on personal data are conducted, and regular articles and educational materials are prepared on the topics of personal data processing, information security and the obligations arising from the provisions of the GDPR.

The Comarch Group is taking steps and investing in technical and organisational resources to ensure effective management of cybersecurity, including mitigating risks and enhancing its positive impact in this area. To this end, it has implemented a set of measures in line with recognised industry standards, including PN-EN ISO/IEC 27001:2023-08 Information Security Management System, which comprise, amongst other things:

- defining requirements and developing recommendations and best practices in the field of security, as elements supporting the implementation of the Security Policy and related operational procedures,
- establishing organisational structures in the field of cybersecurity – within the Comarch Group, there are teams of experts responsible for information protection, who define and implement standards and monitor the security status of the Comarch Group's assets,
- training and education of staff through regular user awareness programmes (Security Awareness) in the areas of information security, identification and resilience to phishing attacks,
- implemented organisational and technical solutions designed to monitor and protect the IT infrastructure,
- internal audits – including comprehensive audits of the Integrated Management System, as well as security audits and penetration tests of systems and applications, aimed at identifying potential vulnerabilities and threats,
- external audits carried out by independent bodies, aimed at verifying compliance with the requirements of the ISO/IEC 27001 standard, 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 designed to monitor and adjust the security level of software produced by the Comarch Group,
- implementing security requirements in systems, depending on the level of criticality and risk,
- periodic assessment of progress towards security objectives at Management Board level, which enables an evaluation of whether cybersecurity objectives have been achieved and in which areas further investment and improvement are required.

These measures and resources are put in place to ensure that specific security objectives within the organisation are met.

Findings from the security management system are reported to the Management Board of Comarch S.A., and on this basis, necessary improvement and corrective actions are taken to further enhance the level of security.

Progress in implementing the above-mentioned measures is verified through audit reports (once a year), analysis of the incident register, updates to procedures and policies, and the indicators/metrics described in the sub-section below.

Measures taken in relation to the supply chain:

- With regard to compliance with the provisions of the GDPR, in relations with subcontractors and suppliers, a detailed verification of contractors is carried out prior to establishing cooperation to ensure compliance with personal data protection requirements, including technical and organisational security measures. Subsequently, regular reviews are carried out and data processing agreements are concluded, setting out the rules for entrusting data processing,
- With regard to ensuring information security in dealings with subcontractors and suppliers, prior to establishing a working relationship, a verification of contractors is carried out to ensure compliance with information security requirements in accordance with the scope of the cooperation.

Progress on the above-mentioned measures is verified through supplier reviews.

Measures taken to ensure the secure and responsible use of AI solutions:

In response to the development of artificial intelligence (AI)-based technologies, the organisation is also taking steps to assess and safely implement AI-based solutions, recognising both the business opportunities arising from their use and the risks associated with the protection of personal data, the confidentiality of information and cybersecurity. In this area, analyses are being carried out concerning the principles governing the permissible use of AI tools, the scope of data that may be processed by them, and the technical and organisational measures required to mitigate risks. These activities also include the drafting and development of appropriate internal policies, including policies, procedures and guidelines on the use of AI solutions, as well as collaboration between the security, legal, compliance and data protection functions to develop a coherent model for the responsible management of AI technologies within the organisation.

Expected outcomes: ensuring the protection of personal data, maintaining full compliance with the GDPR and other industry regulations concerning the protection of personal data, to increase staff knowledge and competence regarding the GDPR and cybersecurity through regular training and awareness campaigns; and to enhance security levels and build trust among customers, partners and staff 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 personal data protection has been identified as material within the organisation following a dual materiality analysis; consequently, the Comarch Group has set targets in this regard.

Objective: From 2025, to raise awareness amongst all staff by conducting regular awareness-raising campaigns on the subject of the GDPR, at a frequency of more than once a quarter. Through this objective, the Comarch Group aims to enhance staff knowledge and competence, which also helps to minimise the risk of breaches.

To monitor the progress and effectiveness of these measures, the Comarch Group has adopted the following metric: the number of awareness campaigns carried out. In 2025, in addition to the mandatory training on personal data, the Comarch Group carried out twice as many awareness campaigns for staff as in the previous year. The total number of campaigns carried out in 2025 was 9. As part of its ongoing efforts to further raise staff awareness, the Comarch Group has planned to carry out at least 10 awareness-raising campaigns in 2026. At the time of writing this report, 4 of these had already been completed.

Data on the campaigns carried out is taken from records maintained by the Data Protection Officer.

Objective: to minimise the risk of a breach by implementing protective measures and, consequently, to reduce the number of breaches. – By the end of 2026, the aim is to reduce the number of breaches compared to 2025.

To effectively monitor progress in minimising the risk of data breaches, the Comarch Group uses the following metric: the number of recorded personal data breaches, which are documented in the data breach register.

In 2025, 27 personal data breaches were recorded within the Comarch Group. The number of breaches recorded in the internal register over the past two years has fluctuated at around a dozen or so cases per year and has remained at a similar, stable level. The increase in the number of recorded breaches during the period under review should be attributed primarily to greater staff awareness regarding the identification and reporting of incidents, partly as a result of the educational initiatives carried out. The intensification of communication and training initiatives has led to a greater willingness to identify and report incidents to the Data Protection Officer, including those of limited scale and low risk. The higher number of reports to the Data Protection Officer did not correspond to a proportional increase in high-severity incidents — of the 27 cases recorded, only one required reporting to the supervisory authority, whilst the remainder were classified as low-risk incidents and recorded solely in the internal breach register.

Stakeholders were not involved in setting the above-mentioned targets.

The second indicator is the number of proceedings and administrative penalties imposed on the organisation. In both 2025 and previous years, there were no administrative proceedings brought against Comarch Group companies (e.g. by the Personal Data Protection Office [UODO]), nor were any penalties imposed for non-compliance with laws and regulations relating to personal data protection (broken down into final and non-final decisions). Actual data, sourced from internal records.

In the area of security, the Comarch Group defines periodic objectives for the continuous planning and implementation of solutions for processes, projects and products. These objectives are based on individual risk analysis, current threats, and customers' expectations and needs – identified in detail during the contract negotiation stage – as well as global standards. The Comarch Group has not set any group-wide, measurable, results-oriented objectives, apart from those relating to the protection of personal data.

Kraków, 11 August 2026

SIGNATURE

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