



COMARCH

**CONSOLIDATED
NON-FINANCIAL DATA STATEMENT
FOR 2020**

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

Dear Shareholders,

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

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

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

The key events related to sustainable development and non-financial reporting, recorded in the reporting period, were continuous improvement of management quality, increased role of "soft" incentives, increased promotion of physical and cultural activity among employees, increasing awareness of diversity among management and employees, as well as improving suppliers' management procedures. The Comarch Group constantly conducts activities to protect the natural environment and promoting pro-ecological attitudes among the crew. The Group constantly supports various initiatives of local communities and significantly increased the scale of charitable activities.

The past year has proved that the Comarch Group was very well prepared to operate also in crisis conditions caused by the Covid-19 pandemic. We are convinced that the Comarch Group due to the very good financial situation, significant product, industry and geographical diversification of its offer and the commitment of employees, will be able to strengthen its market position as a global provider of IT solutions in the coming periods, to the satisfaction of customers, employees, shareholders and the whole social and economic environment.

The Management Board of Comarch S.A. points that the Non-Financial Information Statement for 2018 includes non-financial information regarding Comarch S.A. and the Comarch Capital Group. The statement was prepared in accordance with the requirements of non-financial reporting included in the Accounting Act of 29th September, 1994, European Commission guidelines on Directive 2014/95/EU on reporting on non-financial information and on the basis of the National Non-Financial Information Standards (SIN) issued by the Reporting Standards Foundation. This report includes data for 2020 and comparative data for 2019. No significant adjustments were made to the information contained in previous reports. This report is not subject to certification or external verification by professional auditors.

Management Board of the Comarch S.A.

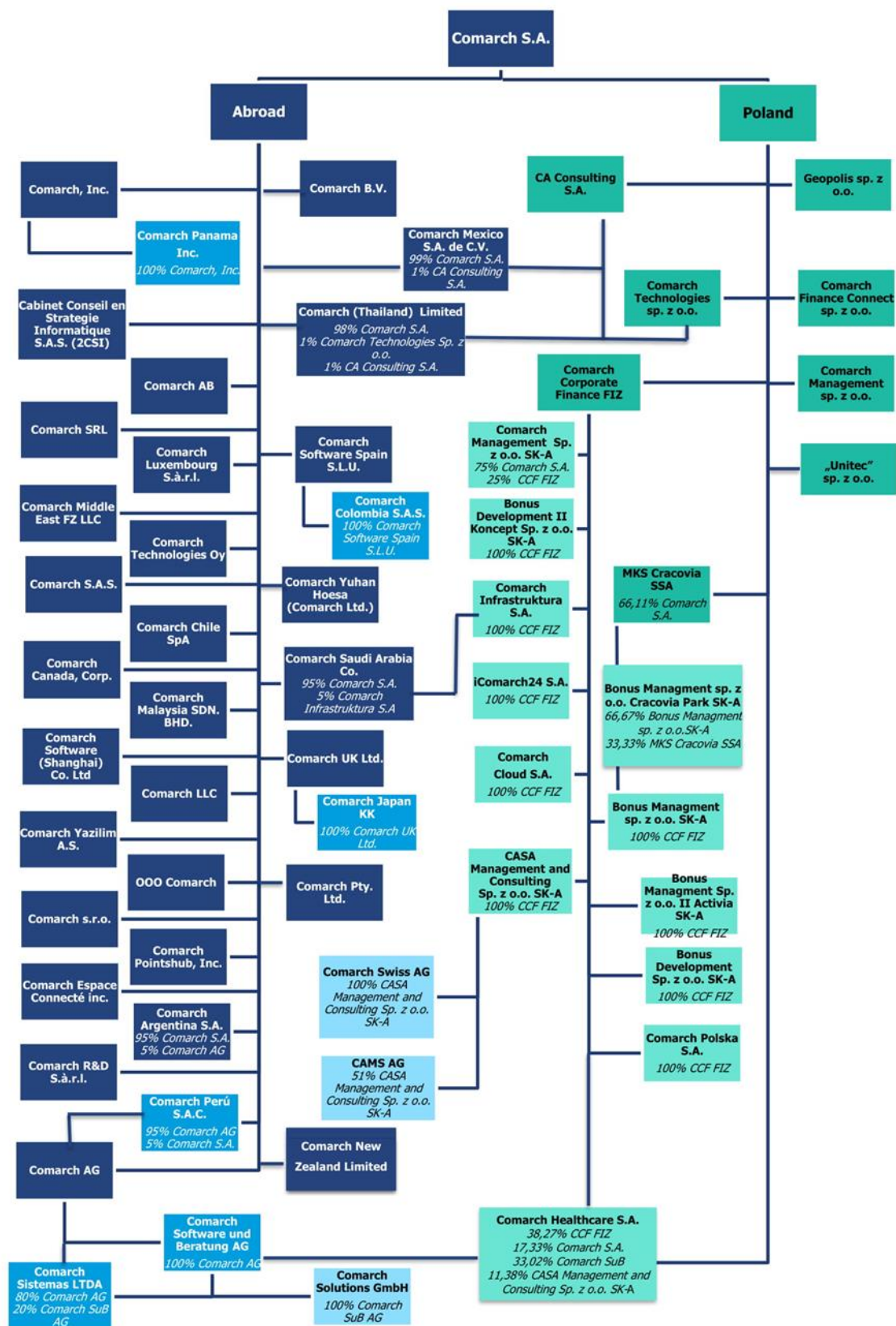
2. Information about Comarch Capital Group

2.1. Structure, Shareholders and Activities of the Company

Structure of Comarch Group

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The Consolidated Financial Statement of the Comarch Group for 12 months of 2020 includes the statements of the following companies. This Non-Financial Information Statement covers all entities of the Comarch Capital Group included in the Consolidated Financial Statement.



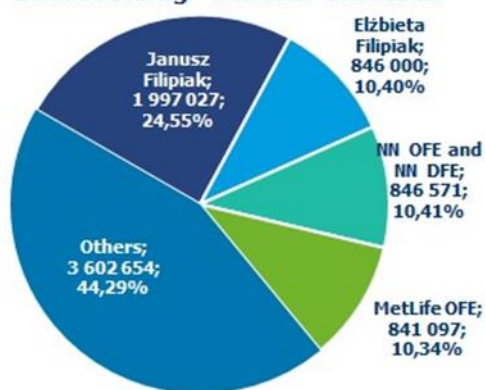
■ 100% Comarch S.A., unless otherwise indicated.

Shareholders and Activities of the Company

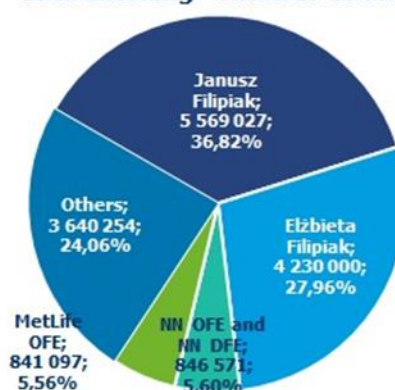
The basic activities of the Comarch Group (the "Group"), in which Comarch S.A. with its registered office in Krakow at Al. Jana Pawła II 39 A is a Parent Company, include activity related to software, PKD 62.01.Z. The registration court for Comarch S.A. is the District Court for Krakow Śródmieście in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

The charts below show shareholders owning directly or indirectly through subsidiaries at least 5% of the total number of votes at the General Meeting of Comarch S.A., as at 30th of April, 2021.

Shareholding - number of shares



Shareholding - number of votes



The Comarch Capital Group is a producer of innovative IT systems for key sectors of the economy both in Poland and abroad. The main strategy of Comarch is to provide customers with complete IT solutions based on their own products, also in the service model. Thanks to the employed high-class specialists and thanks to its professional infrastructure, Comarch is able to provide both IT products as well as services for their implementation and maintenance as well as advisory and integration services for clients all over the world. Thanks to this, recipients of products and services offered by Comarch can take full advantage of the opportunities offered by

modern IT systems and optimize their business processes.

The wide range of Comarch's offer includes ERP class systems, financial and accounting systems, CRM systems, loyalty software, sales support and electronic document exchange systems, electronic banking systems, ICT network management systems, billing systems, Business Intelligence software, security management services and data protection, and many other solutions. Comarch is a solution provider, including for entities from public administration, banking, accounting offices, enterprises from the FMCG sector, airlines, automotive industry, medical sector, manufacturing companies, public utilities, capital markets, telecommunications and insurance companies, universities, commercial and service companies, transport companies, fuel suppliers as well as entities conducting brokerage, e-commerce or factoring activities.

The Comarch Group focuses on developing IT solutions in the service model - Comarch is one of the market leaders in this area. Last year, the Comarch Group launched a comprehensive offer for Comarch Cloud, with the highest security standards, based on the Comarch Data Centre infrastructure. Thanks to Comarch Cloud, customers can use the software, store data and run their businesses without the need to have their own IT infrastructure, while having high performance, reliability, security and scalability ensured.

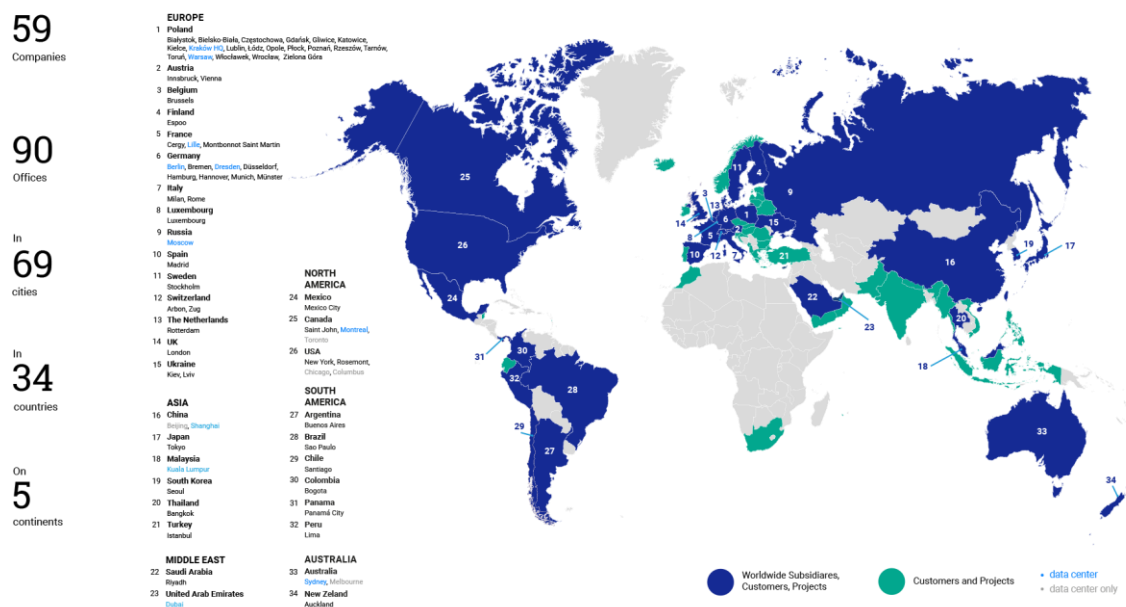
A detailed description of the products and services provided was included in point 3 of the Statement of Comarch S.A.'s Management Board regarding the activities and Statement of Comarch S.A.'s Management Board regarding the activities of the Capital Group.

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

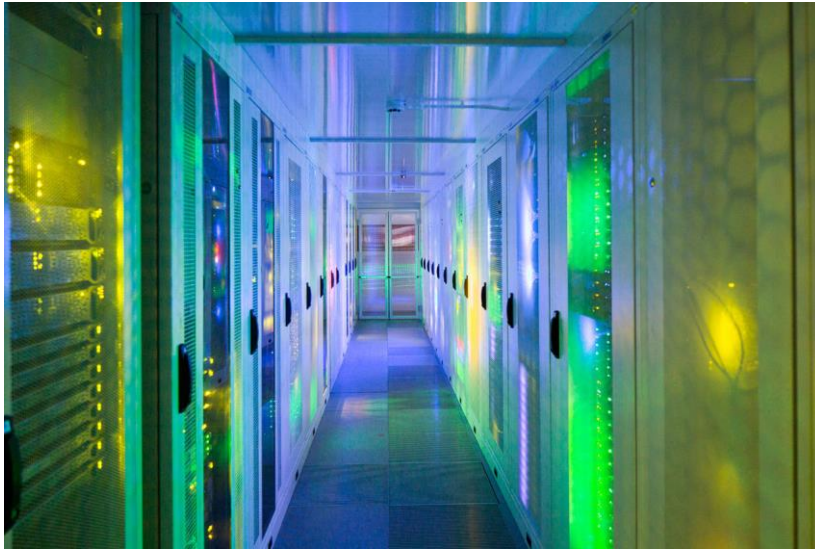
As at the date of publication of the statement, Comarch S.A. has 20 branches in Poland and 1 in Albania, the Comarch Group consists of 61 companies located on 5 continents, in 34 countries, in 90 locations around the world. Last year, the Group successfully continued its growth strategy based on the diversification of its operations between various industry segments, the development of its own products and their sale on the global market. For many years, one of the main strategic goals of Comarch is the development of sales of more and more products on foreign markets, in particular in Western Europe, both Americas and Asia. In the previous year, the Comarch Group established new subsidiary - Cabinet Conseil En Strategie Informatique SAS (2 C.S.I.) in France, Comarch New Zealand LTD in New Zealand, Wszystko.pl Sp. z o.o. (previously „Unitec” Sp. z o.o.) and LLC „Comarch Software” in Ukraine. In 2021, there are planned further equity investments on the domestic and foreign markets. Detailed information on changes in the organizational structure can be found in point 1 of the Consolidated Financial Statements for 2020.

In the reporting period, there was an increase in cooperation with foreign suppliers related to the realization of purchases for own production of Comarch S.A. and related to increasing the company's effort towards research and development.

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



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



Comarch stores data in 20 data centres worldwide including four of its own (Krakow, Warsaw, Dresden, Lille).

In August, 2020, Comarch Inc. purchased non-developed land in Mesa, Arizona, USA. The purchased land with an area of 12,141 square meters is located in the Elliot Road Technology Corridor, within which the largest high-tech enterprises operate. A modern server room Comarch Data Centre will be built on the acquired land, where the Company will provide its services to the most

demanding customers from the USA and other countries of North and South America. The Company plans to start the investment in 2021.

Other basic information about Comarch S.A. and the Comarch Group were published respectively in point 1 of the Statement of Comarch S.A.'s Management Board regarding the activities and Statement of Comarch S.A.'s Management Board regarding the activities of the Capital Group.

2.2. Research and Development and Activities in the Special Economic Zone

Research and development works

S.1.1.

One of the main strategic goals of the Comarch Group is the development of new, competitive products that allow Comarch to further develop and, consequently, increase its value. Maintaining dynamics of sales requires expenditures on product development



and their proper promotion and marketing. This applies to both modifications to existing products and technologies, as well as the development of new products. Expenditures for research and development in 2020 reached PLN 263.7 million and thus exceeded 17,2% of Comarch Group's sales revenues. The Comarch Group allocated both own resources to them and actively acquired European funds. These funds are actively acquired by two Comarch Group companies - Comarch

S.A. and Comarch Healthcare S.A. Expenses for research and development in Comarch S.A. in 2020 reached PLN 231.6 million, which accounts for 23.2% of the company's sales revenues.

Activities in the Special Economic Zone

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

A detailed description of the investment allowances held for operating in the Special Economic Zones has been published in note 3.10 of the Consolidated Financial Statements of the Comarch Group for [2020](#).

S.1.2.

The table below presents sales to customers from the public sector in 2019 - 2020.

in thousands of PLN	2020	%	2019	%
Revenue Comarch S.A.	999,401	100.0%	951,698	100.0%
<i>Including public sector</i>	23,858	2.4%	40,636	4.3%
Revenue Comarch Group	1,536,753	100.0%	1,437,423	100.0%
<i>Including public sector</i>	154,541	10.1%	130,352	9.1%

In 2020, the Comarch S.A.'s revenue from sales to the public sector clients decreased by PLN 7,131 thousand, i.e. by 41.3%. Regarding Comarch Group's revenue from sales to public sector, they increased by 18.6%, i.e. PLN 24,189, which is related to completion of large contracts for supply of IT products and services. The public sector was responsible for 10.1% of revenue of the Comarch Group in the discussed period.

Number of subsidies received in particular years

The table below presents the number of subsidies received by Comarch S.A. and the Comarch Group in 2019 - 2020.

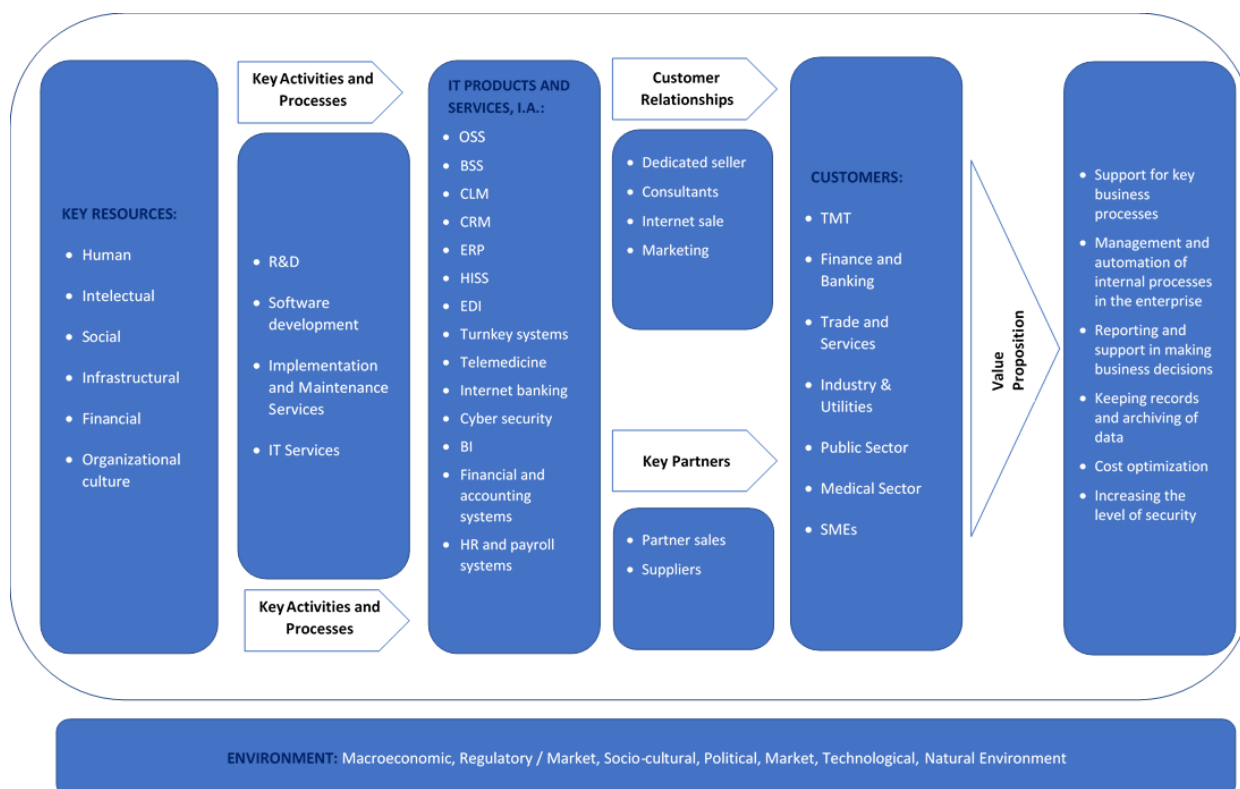
in thousands of PLN	2020	2019
Comarch S.A.		
7 Framework Program (European Commission)	-	44
Structural Funds POIG (Operational Program Innovative Economy)	-	-
Structural Funds POIR (Operational Program Innovative Development)	859	1,485
National funds	-	-
De minimis aid	144	-
Total	1,003	1,529
The Comarch Group		
7 Framework Program (European Commission)	-	44
Structural Funds POIG (Operational Program Innovative Economy)	-	-
Structural Funds POIR (Operational Program Innovative Development)	859	1,485
National funds	-	-
De minimis aid	301	214
Regional Operational Programme of Łódzkie Voivodeship	(361)	-
Total	799	1,744

2.3. Organizational Culture and Business Model

For nearly 30 years, Comarch has been consistently building an organizational culture and value system, including:

- Ongoing efforts aimed at ensuring the quality and competitiveness of our products and services
- Improving products and services in order to meet the requirements and expectations of our customers,
- Engaging in mutually beneficial cooperation with our suppliers to improve the quality and offered products and services,
- Protecting the information assets of our clients and reinforcing the confidence of customers and other interested parties in the area of information security,
- Improving the skills and qualifications of personnel through an effective education system and trainings aimed at areas related to quality, information security, environmental protection, energy management and occupational safety,
- Continual improvement of occupational safety and health of all employees, including during an epidemic,
- Preventing of workplace accidents, occupational diseases and high potential accidents,
- Actively engaging in activities aimed at limiting negative environmental impacts and improving energy efficiency,
- Obeying applicable legal requirements and other,
- Continuous improvement of the effectiveness of the Integrated Management System, including AQAP 2110 and AQAP 2210,
- Providing appropriate resources and means to implement the above actions.

COMARCH Business Model



2.4. Key Non-Financial and Financial Performance Indicators

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

As at 31st of December, 2020, Comarch S. A. employed 5,006 persons compared to 4,979 persons employed as at 31st of December, 2019, while in the entire Capital Group the number of employees increased to 6,462 persons compared to 6,348 persons as at 31st of December, 2019.

The tables below present the average number of people employed at Comarch S.A. and in the Comarch Group in 2016 - 2020.

Average number of employees in Comarch S.A.	2020	2019	2018	2017	2016
Employment agreement	4,117	4,057	3,753	3,492	3,416
Other form of employment	925	930	934	844	888
Total	5,042	4,987	4,687	4,336	4,304

As at 31st of December, 2020, in the Group 3,010 employees were employed in Krakow, 1,996 in other cities in Poland.

Average number of employees in Comarch Group	2020	2019	2018	2017	2016
Employment agreement	5,119	5,087	4,727	4,393	4,323
Other form of employment	1,383	1,361	1,364	1,245	1,276
Total	6,502	6,448	6,091	5,638	5,599

As at 31st of December, 2020 in Comarch Group 3,639 employees were employed in Krakow, 2,239 in other cities in Poland and 584 outside of Poland.

Details on employment are described in point [6.1.](#) of this statement.

The activities of the Comarch Group are not indifferent to the condition and improvement of the natural environment. The Group makes every effort to both minimize the negative impact on the environment and actively act for its protection, minimizing the consumption of natural resources and limiting the generation of waste resulting from its current operations.

The tables below present the consumption of electricity, heat, gas, water and CO₂ emissions in Comarch S.A. and in the Comarch Group in 2019 - 2020.

Electricity, heat, gas and water consumption and overall CO ₂ e emissions of the Comarch Group	2020	2019
Electricity consumption	21,766,435 kWh	22,309,884 kWh
Heat consumption	6,769,681 MJ	7,188,247 MJ
Gas consumption	465,673 m ³	459,156 m ³
Water consumption	30,483 m ³	45,532 m ³
Overall emission of CO ₂ e	16,288 Mg CO ₂ e	18,752 Mg CO ₂ e

Electricity, heat, gas and water consumption and overall CO ₂ e emissions of the Comarch Group	2020	2019
Electricity consumption	17,364,894 kWh	17,594,566 kWh
Heat consumption	4,037,720 MJ	4,248,000 MJ
Gas consumption	465,673 m ³	451,749 m ³
Water consumption	24,655 m ³	37,591 m ³
Overall emission of CO ₂ e	14,347 Mg CO ₂ e	16,211 Mg CO ₂ e

Details on electricity, heat, gas, water and other emissions are described in point [8](#) of this statement.

2.5. Membership in International Organizations

Comarch is a member of **IT organizations**, such as ETIS and TM Forum, thus has continuous access to the latest standards emerging in these areas.

The TeleManagement Forum (TMF) is a non-profit organization that was founded in 1988 to accelerate the development of telecommunications network management systems. ETIS, on the other hand, is an international organization which aim is to support members in increasing their business efficiency by exchanging information on the effective use of computer technologies.

In 2019, Comarch joined MEF - an industry association associating over 200 companies from the telecommunications industry.

Since 2020, Comarch has been a member of the O-RAN Alliance - a consortium dealing with the promotion based of a software, extensible RAN network and the standardization of critical elements of the O-RAN Alliance architecture.

Comarch is also a member of **international chambers of commerce and trade**, including the Polish-German Chamber of Industry and Commerce and the French-Polish Chamber of Commerce, or industry organizations around the world.

In Spain, Comarch is a member of AECOC - the Spanish representative of the global organization GS1 and Asociación XBRL España - an association promoting the implementation, adoption and development of the XBRL language in order to unify the standards for presenting financial statements.

In Japan, Comarch belongs to the 21c Club business club as part of EGG JAPAN. 21c Club supports enterprises in creating and developing new B2B companies and is a platform for the exchange of knowledge and experience.

In Italy, Comarch is a member of the Retail Institute Italy, whose mission is to promote the culture and development of the entire sector by offering basic content and strategic activities. In addition, Comarch belongs to Assolombarda - an association of companies operating in the metropolis of Milan and in the provinces of Lodi, Monza and Brianza in Pavia. The role of the association is to support member companies in contacts with local companies and institutions. Comarch is also a member of the Osservatorio Innovazione Digitale in Sanità. The mission of the institution is to create and disseminate knowledge about the impact that digital technologies have on enterprises, public administration and citizens.

In the Benelux countries, Comarch belongs to the Belgian-Polish-Luxembourg Chamber of Commerce, whose mission is to promote Belgian and Luxembourg investments and exports to Poland, and to support Polish companies in cooperation with Belgian and Luxembourgish companies. Wojciech Pawluś, Comarch's Managing Director for the Benelux countries is a member of the BEPOLUX management board.

In France, Comarch is a member of the HUB-RETAIL "Cross-Canal and Omni-Logistics" association. The aim of the organization is to unite and cooperate between the business community in the Auvergne-Rhône-Alpes region and the logistics sector associated with it. Comarch also belongs to the Adira organization, which brings together all regional IT players. In addition, Comarch is a member of AD2N, a regional association that brings together over 40 companies that provide digital services (ESN) and manufacturers of IT systems. It is also active in the structures of the Syntec Numérique. It is a professional organization that brings together companies providing digital services (ESN), software publishers and consulting companies in the field of technology (ICT). The company also belongs to Clubster NSL - Nutrition, Santé, Longévité, a cluster of companies from the agri-food, health, medical, biotechnology and e-health industries, which stimulates exchange and cooperation between the academic and industrial world and supports candidate innovative projects in the search for regional, national and European sources of funding.

Comarch is also a member of the PIKOM cluster, which brings together both small and large research laboratories and training institutions dealing with a specific industry branch.

In Australia, however, Comarch is a member of the Australian Loyalty Association. It is an organization founded to promote education and networking opportunities for people working in the loyalty industry. In addition, it is also a member of Loyalty360, an association that operates in the market of customer loyalty marketing solutions, whose goal is to enable and encourage dialogue between industry leaders.

2.6. Awards and Rankings in 2020

Comarch became a laureate of "**The Most Important Companies for Poland**" ranking in the Capital Group category - private companies and financial institutions. The contest was organized by "Rzeczpospolita" daily. The "Most Important Companies for Poland" ranking reflects important trends in contemporary business. The prize was awarded in three equal categories: capital group, individual enterprise, and family business. In addition, companies with over 100 years of tradition were honoured. The financial results of companies for the years 2017–2019 were analysed. In addition to economic indicators, the editors of Rzeczpospolita took into account the role that the company plays in social reality - from issues related to taxes, through the level and forms of employment, activities for local communities, to activities related to climate protection.

The editors of the "**Polityka**" weekly awarded Comarch with a **White Leaf** for activities in the field of corporate social responsibility and the implementation of solutions supporting sustainable development. The corporate social responsibility review is prepared on the basis of the results of a

questionnaire sent to enterprises. As every year, the analysed areas were, among others: corporate governance, human rights, behaviour towards employees, environmental protection, customer care, business honesty and social commitment. The partners of the ranking are the consulting company - Deloitte and the Responsible Business Forum.

Comarch was also among the strongest business brands on the Polish market and was awarded **the Business Superbrands 2020 title**. The winners of the Business Superbrands 2020 title are brands that enjoy the greatest recognition and reputation, as well as have successes in the national and international arena in specific industries. In the study, experts assessed the market position of the brand in Poland, the quality of products or services, the quality of B2B relations, as well as innovation and CSR activities.

Comarch was at the top of the ranking prepared by the analytical and research company Polityka Insight and took eighth place in the **"National Champions 2020"** ranking. This was the third edition of the report prepared by the analysts of Polityka Insight. The leitmotif of the publication was human capital. When developing the Human Capital (KL) indicator, the following factors were taken into account: the share of the payroll fund in the generated added value, the number of employed specialists, which takes into account the percentage of staff with higher education, the scale of staff turnover and trade union membership in the company.

Comarch took the first place in six categories of the edition of the **"ITwiz Best 100"** ranking for 2019. "Gold" won in the rankings: sales to the commercial sector, sales to the industrial sector, the largest company with Polish capital selling its own products and services, sales to the telecommunications sector, sales of integration services and sales of cloud computing services. In addition, the company was at the forefront in several other categories, including: companies with the highest sales to the SME sector (2nd place), sales of ERP systems (2nd place), sales of mobile applications (2nd place) and companies with the highest employment (3rd place), sales of CRM software (3rd place) and sales to the financial sector (3rd place).

The ITwiz Best100 report is a ranking of manufacturers and suppliers of IT solutions and services present on the Polish market, according to sales results. The publication is prepared by the editors of ITwiz.

In the **Computerworld TOP200 2020 Edition report**, Comarch took the first place in the following categories: provider of IT solutions and services for the telecommunications sector and service provider in the cloud model. The silver medal was won by, among others, in the lists of suppliers of solutions and services for the industrial, construction and production trade sectors, as well as IT companies with the largest expenditure on R&D. Comarch came third in the following categories: the largest suppliers of Enterprise Resource Planning systems, IT companies with the highest increase in employment and the largest exporters of IT solutions.

"Computerworld TOP 200" is a prestigious publication which has been the basic point of reference for over 25 years for people interested in the Polish ICT industry: IT managers, IT specialists and analysts, as well as potential customers looking for knowledge about suppliers' offers.

Comarch has received **the Innovation Award for eHealth** for the development of IT solutions for the medical industry on the Italian market. The company offers a whole complex of solutions for healthcare, which consists of EHR Cloud, Telemedicine Cloud, Hospital Cloud and Medical AI Cloud. The integration of these platforms helps to ensure coordinated healthcare and support for patients, carers and medical staff.

For the second time in a row, Comarch won in the **"Cloud Services" category in the "Trusted Brand 2020"** survey conducted among Polish entrepreneurs. The respondents spontaneously answered which brand in a given category they trust the most. They indicated Comarch as the most popular service provider in the cloud model. The "Trustworthy Brand" survey is carried out every year and checks the level of trust in business brands. The survey is conducted by the Kantar Polska research institute on behalf of the "MyCompany Polska" magazine.

During this year's **@Hewlett Packard Enterprise Partner Congress**, which took place as at 6th of February in Łódź. Comarch has been awarded a gold partner status - HPE Gold Hybrid IT Partner. The company also received an award in the category "The greatest sales in the as-a-service model". This award confirms competence in the implementation of IT projects using HPE technology in the service model and is a continuation of the global HPE CEEMA Service Provider of the Year award granted to Comarch at the end of 2019.

Comarch in analytical companies reports

Comarch is included in the **"Market Guide for CSP Business Support System Solutions"**. This is a report prepared by Gartner - a research and consulting company. The material provides guidance for IT executives and communications providers looking to upgrade or transform their BSS services into a digital platform. The Gartner report contains a detailed market analysis, BSS vendor profiles and market recommendations, which can be beneficial for CIOs at CSPs.

- "Recognition of Comarch in the Gartner Market Guide for CSP Business Support System Solutions report, confirms our strong position on the BSS vendors market" – says Dominik Pacewicz, Head of Product Management at Comarch. "Year by year, Comarch aims to meet the ever-changing technological and business requirements with success. 5G, IoT and other disruptive technologies are challenging CSPs to modernize and transform their organizations. By providing innovative OSS/BSS solutions to its customers, Comarch not only becomes part of the change, but also drives further developments."

According to the **"Poland Enterprise Application Market 2020 - 2024 Forecast and 2019 Vendor Shares Analysis"** report, Comarch maintains over twenty percent of the IT solutions market for enterprise management in Poland and maintains the position of the largest Polish supplier of ERP systems on the domestic market. At the same time, the company increases sales to the segment of small and medium-sized enterprises. In 2019, sales revenue of Comarch ERP solutions in Poland increased by over 18% and amounted to PLN 190 million. This accounts for 20.4% of the entire enterprise management systems market and gives the company second place in the list of manufacturers, taking into account both Polish and foreign companies.

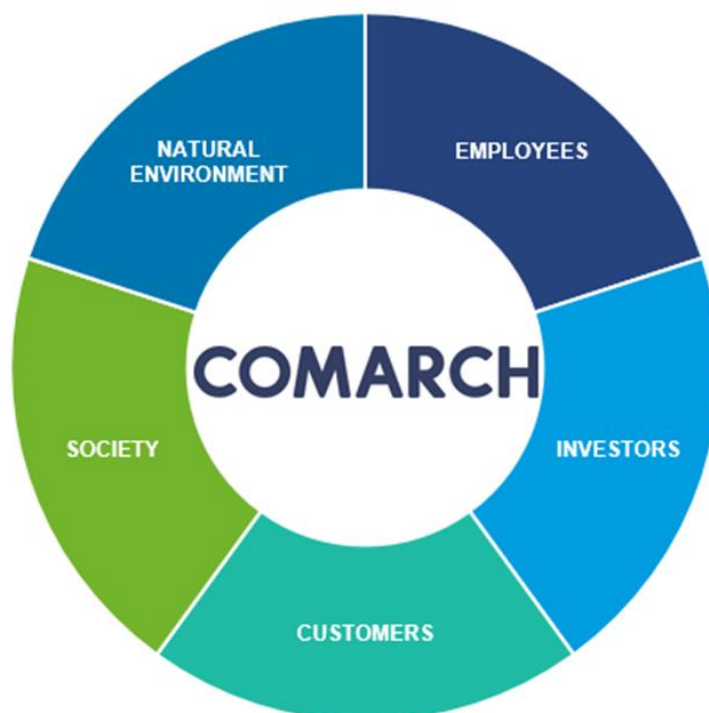
3. Stakeholder Engagement

The selection and description of policies as well as the effectiveness indicators presented in the statement has been made on the basis of the materiality criteria, taking into consideration internal and external factors related to the operations of Comarch S.A. and the Comarch Group. The main factors taken into consideration during the materiality assessment were:

- Business profile and market environment,
- The branch in which Comarch operates,
- Impact on the community and the natural environment,
- Stakeholders' expectations.

The Management Board actively participates in the process of defining the content of the statement and approves all strategic decisions related to the process of creating a non-financial data statement. During its creation, the expectations of stakeholders were also taken into consideration.

The basis for identification and selection of stakeholders is the definition adopted by Comarch Group, according to which a stakeholder is an entity that has influence and is influenced by its activities.



The key stakeholders of the Comarch Group include:

- **Employees** (full-time employees and co-workers, interns, apprentices, students and potential employees, employees of subcontractors and suppliers, labour inspection and other similar supervisory institutions),
- **Investors** (shareholders, institutional investors, individual investors, Warsaw Stock Exchange, brokerage houses, banks, Polish Financial Supervision Authority, KDPW),
- **Customers** (institutional clients, individual clients, business partners, key suppliers, subcontractors, local self-government administration, government administration),
- **Society** (local communities within the Comarch Group's activity, residents, government and self-government authorities, media, including industry journalists and the press, universities and research workers, technical and industry organizations),
- **Natural environment** (environmental organizations, recycling companies).

The Management Board of the Comarch Group is aware of the need to involve stakeholders in the conducted activity. The Comarch Group engages in dialogue with all stakeholder groups.

The method of engaging stakeholders belonging to particular groups and the goals of the dialogue with them are presented below.

- **Employees:** recruitments, performance reviews, internal meetings, internal communication (mailings, portal for employees, Intranet), periodic happenings and events supporting an active lifestyle (e.g. by bike to work, ComarchOnRun / OnBike, racing events);
Dialog purpose: ensuring stabilization of employment turnover by meeting employees' expectations, providing employees with development opportunities, creating a satisfactory and stable workplace;
- **Investors:** regular meetings at summary conferences in Krakow or Warsaw (also interactive on-line broadcasts and video recordings), individual meetings and teleconferences with the Management Board of the Company, permanent cooperation of Capital Market and Insurance Department with stakeholders listed in point a), Investor Relations website, participation in conferences co-organized by financial and capital market

institutions such as banks, investment funds, WSE, KDPW, Polish Financial Supervision Authority, and Polish Association of Listed Companies;

Dialog purpose: ensuring information transparency, meeting the information needs of stakeholders, building Comarch value, taking care of Comarch's reputation;

- **Contractors:** Company website, customer satisfaction survey, business meetings for the needs of contract performance and improvement of the quality of provided services and supporting the functioning of the community of users of Comarch solutions, e.g. in the form of regular meetings (including the annual Comarch User Group) or running websites dedicated to Comarch solutions on social networks, partnership cooperation with suppliers;

Dialog purpose: customer expectations and opinions survey, listening the client's voice in designing business solutions, creating products and services tailored to needs of customers;

- **Society and government/local government authorities:** current direct communication, realization of sponsorship projects, building partnerships, realization of joint projects, organization of educational and preventive programs for health protection, stable contact with media (by phone, e-mail, during conferences and press briefings), organization of internship programs;

Dialog purpose: carrying social responsibility, supporting community development, supporting students and graduates in gaining knowledge and experience, ensuring compliance with requirements and regulations, creation of workplaces;

- **Natural environment:** organizing pro-ecological campaigns, cooperation with media suppliers, energy producers, environmental organizations and recycling companies;

Dialog purpose: improvement of the quality of the natural environment, reduction of energy consumption, emission of pollution, reduction of the amount of waste generated;

An example of stakeholder involvement in the Comarch Group is the **Unique Comarch ERP Community**. The Comarch ERP community is a platform on which Comarch ERP customers help each other by exchanging knowledge about Comarch ERP systems, and also submit ideas for the development of these systems. All submitted ideas can be commented on and evaluated by members of the Community, Comarch analyses the highest-rated ones in terms of implementation. Comarch Partners are also active in the community, supporting customers with their knowledge and experience and also reporting ideas for software development. Comarch employees also participate in the discussions.

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

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

On the main page of the platform, www.Spolecznosc.Comarch.pl, you can follow the current statistics, which at the end of March 2021 are as follows:

- 11,618 questions asked,
- 31,675 answers,
- 13,148 comments,
- 2,722 ideas for new functionalities and improvement of existing ones, over 300 of which have been implemented by Comarch.

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

4.1. Integrated Management System

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

G.2.2.

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

- Certificate of Integrated Management System compliant with the requirements of PN-EN ISO 9001:2015-10 Quality Management Systems, PN-EN ISO 14001:2015-09 Environmental Management Systems, PN-N-18001:2004 Occupational Safety and Health Management Systems, PN-ISO/IEC 27001:2014-12 Information Security Management Systems,
- Certificate of Energy Management System compliant with the requirements of PN-EN ISO 50001:2018-09 Energy Management Systems,
- Certificate of the Export Control System, which meets the requirements of Article 11(2) the Act of 29th of November, 2000 on foreign trade in goods, technologies and services of strategic importance for national security, as well as for maintaining international peace and security (as amended),
- Certificates which confirm that the Quality Management System meets the requirements of AQAP 2110: 2016- NATO requirements for quality assurance in design, development and production as well as AQAP 2210: 2015- NATO supplementary requirements for AQAP 2110 regarding software quality assurance.

Certificates of the Integrated Management System, Energy Management System and Export Control System Policy were issued by the Polish Centre for Testing and Certification (PCTC). The certification body for the AQAP system at Comarch is the Quality Certification Centre (QCC) operating at the Military University of Technology.

The Integrated Management System has been implemented and certified in Comarch S.A., while the implemented procedures are in force in the companies of the Comarch Group.

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

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

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

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

G.2.3.

Broadly understood technological development and rapidly growing competition put new requirements on software, implemented IT systems and goods in circulation. The necessity to meet these requirements means that the products provided by Comarch may

be goods of dual-use and be used in a manner inconsistent with the principles of national and international law. To prevent such practices, the Export Control System Policy has been implemented within the Comarch Capital Group, whose main document is the **Export Control System Policy**. The main assumptions of this policy are as follows:

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

G.3.1., G.3.2.

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

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

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

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

Risks identified in connection with the functioning of the Quality Management System:

- Risk related to the occurrence of non-compliance and instability in internal processes,
- Risk related to the deterioration of the quality of products and services offered,
- The risk of losing customers due to failure to meet their quality expectations.

Risks identified in connection with the functioning of the Export Control System:

- The risk related to incorrect classification of products and services under ECS,
- The risk related to undertaking a cooperation with a contractor on the Lists of refusals,
- Risk related to the realization of transactions with entities from countries subject to legal sanctions,
- Risk related to non-compliance with legal requirements and internal procedures regarding ECS,
- risk related to financial penalties for non-compliance with Polish and European law.

Risks identified in connection with the operation of the Occupational Health and Safety Management System:

- Risk related to insufficient level of occupational health and safety of employees,
- Risk related to accidents, occupational diseases and events potentially conducive,
- Risk related to non-compliance with legal requirements,
- Risk related to negative results of external audits.

Risks identified in connection with the operation of the Environmental Management System:

- Risk related to non-compliance with applicable legal requirements and incurring financial penalties for violating environmental obligations,
- Risk related to the negative impact on the environment,
- Risk related to failures of installations, systems and devices.

Risks identified in connection with the operation of the Energy Management System:

- Risk related to inadequate energy supply in the future,
- Risk related to the negative impact on the environment,
- Risk related to penalties for breaches resulting from the provisions of the Energy Efficiency Act.

Risks identified in connection with the operation of the AQAP 2110 and AQAP 2210 Systems:

- Risk related to the inability to obtain a contract to provide products and/or services for the armed forces in Poland and other NATO countries,
- Risk related to failure to meet the requirements of applicable contracts, including the implementation of the Government Quality Assurance process,
- Risk related to the inability to provide products and/or services that meet NATO's quality assurance requirements for design, development and production, and software quality assurance.

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

G.2.1., G.3.1.

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

All the activities described above aim at minimizing the identified risks areas, managing them and keeping current control. The Comarch Group in its operation at all levels of the organizational structure applies the precautionary principle, especially during the development and marketing of new IT products.

In the case of the ECS, an important role play IT systems dedicated to issues related to them, e.g. a system of the contracts workflow, where individual steps enforce specific actions required by IMS. Specific, for ECS, processes, such as dealing with dual-use goods and services or verification of contractors on refusal lists, are described in internal procedures.

For communication purposes, e-mail addresses were provided to which employees can submit their comments. Employees also have the option of submitting anonymous reports regarding violations of the implemented policies, which are sent to the addressees in paper form via internal mail.

As part of the Integrated Management System, internal audits are carried out, the number of which in 2020 it was 204. Internal audits are carried out in all entities covered by IMS according to the annual plan. Supervision over the processes specific to ECS is also performed as part of internal audits.

As part of internal audits, there are statistics on non-compliance with the internal procedures of the Integrated Management System. There is also kept a register of strengths and weaknesses of audited

entities. In 2020, 43 non-compliances, 220 strengths and 217 potentials for improvement were identified.

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

Information Security Management System and Security Policy

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

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

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

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

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

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

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

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

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

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

Supplier Sustainability Policy

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

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

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

These commitments are implemented mainly through:

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

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

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

G.3.2.

As part of the Supplier Sustainability Policy, the following critical risks were identified:

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

- Risk related to non-compliance with legal requirements and internal procedures regarding contractors.

G.3.1.

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

Policy of Respect for Intellectual Property of Third Parties

[dimensions: society, employment]

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

The Comarch Group has implemented the **Policy of Respect for Intellectual Property of Third Parties**. The basic policy objectives in force regarding these issues are:

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

Detailed objectives the policies resulting from the primary objectives are:

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

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

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

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

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

G.3.2.

As part of the Respect for Intellectual Property of Third Parties Policy, the following critical risks were identified:

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

G.3.1.

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

4.2. Management Systems Implemented in the Companies of the Comarch Group

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

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

Besides the core activities related to software and IT systems development and the provision of services in this area, Comarch also conducts activities in the field of production and marketing of medical products and have a certified Quality Management System for Medical Devices in accordance with the EN standard. ISO 13485: 2016.

The scope of the certificate for Comarch Healthcare S.A. includes design and development, production, distribution and servicing of vital signs monitoring systems as well as post-implementation service, while for Comarch S.A. design and development, own and contract production, distribution, implementation and servicing of software as well as products and accessories as well as systems for monitoring vital functions as well as the implementation of post-implementation services in this area.

Certificates of the Quality Management System of Medical Devices were issued by TÜV Rheinland Polska Sp. z o.o.

In terms of health and safety impact, all products- medical devices created by Comarch S.A. and Comarch Healthcare S.A. are tested. These products are subjected to appropriate analysis and certification.

With a view to improving the life quality and a sense of security and for the health of our clients, Comarch offers a wide range of products and medical services. Offered products are created as a response to market needs in the field of prevention and treatment, and are prepared on the basis of the latest technologies as a result of the cooperation of Comarch qualified employees with the scientific

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

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

- Adapt products and services to the expectations and requirements of clients, maintaining the requirements of legal regulations in the scope of production and distribution of medical devices and provision of medical services as well as in the field of IT products and services,
- Place products and services on the market that meet the quality and safety requirements,
- Reliably inform about the quality and safety of the offered products and services,
- Constantly and systematically take care for the quality and competitiveness of the offered products and services,
- Develop cooperation with suppliers to improve the quality of offered products and services,
- Raise qualifications,
- Constantly improve the efficiency of the quality management system for medical devices.

The means of achieving the above objectives are implemented and constantly improved quality management systems developed and based on the requirements of:

- Directive 93/42/EEC Medical devices (MDD),
- EN-ISO 13485 Medical Devices standard. Quality Management Systems. Requirements for the purposes of legal provisions,
- ISO 9001 standards, Quality management systems - Requirements.

G.3.2.

As a part of the Policy of Quality of Medical Devices, the following critical risks have been identified:

- The risk of placing products and services that do not meet the quality and safety requirements,
- Health, life and safety risk of users of medical products and services,
- The risk of deterioration in the quality of medical products and services,
- Risk related to non-compliance with legal requirements and internal procedures in the scope of medical devices and services.

G.3.1.

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

In the case of medical devices, there is also a possibility to report the medical incidents, i.e. irregularities regarding a medical device that may or may have led to the death or serious deterioration of the health of the patient or user of the device. A register of such cases is kept in Comarch S.A. and Comarch Healthcare S.A. Since the beginning of the activity, no medical incidents have been identified in the field of medical devices.

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

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

G.2.2.

iMed24 Medical Centre, established in 2012, follows the principles of professionalism, innovation and cooperation based on trust and understanding. Years of experience have allowed us to develop the highest standards of services, which is reflected in the received certificate confirming that the Quality Management System meets the requirements of ISO 9001: 2015. The scope of the certificate covers the provision of health services as

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

Quality policy implemented at Comarch Healthcare S.A. presents the obligations of the Management Board and employees of the company in relation to services and products and has been described in detail in the *Quality Management System for Medical Devices Comarch S.A. and Comarch Healthcare S.A.*

G.3.2.

The scope of activity of the iMed24 Medical Centre related to the provision of medical services carries specific risks. Risks within the system are identified at the company-wide level. Within the system identified:

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

G.3.1.

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

Quality Management System at Comarch Healthcare S.A. BU HIS

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

G.2.2.

Comarch Healthcare S.A. BU HIS operates in the IT industry in the medical sector, developing comprehensive solutions for medical facilities. The company is located in Katowice, ul. Baildona 66 has a certified Quality Management System in accordance with the ISO 9001: 2015 standard. The scope of certification includes design and development, production, sales, implementation, service and maintenance of IT solutions, as well as consulting and training in the given scope. The certification process is carried out by Bureau Veritas Polska Sp. z o.o.

Quality policy implemented at Comarch Healthcare S.A. presents the obligations of the Management Board and employees of the company in relation to services and products and has been described in detail in the *Quality Management System for Medical Devices Comarch S.A. and Comarch Healthcare S.A.*

G.3.2.

As part of the system implemented at Comarch Healthcare S.A. BU HIS identified the following risks:

- Risk related to the non-compliance of products with legal requirements, in periods set by the legislator,
- Risk related to the occurrence of non-compliance and instability in the internal processes of medical units covered by computerization.

G.3.1.

Comarch Healthcare S.A. BU HIS, operating as part of the Comarch Group, has a number of mechanisms aimed at minimizing identified risk areas, controlling them and exercising ongoing control. The mechanisms are described in detail in the section on the Integrated Management System.

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

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

G.2.2.

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

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

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

The assumptions of the Comarch Group's Security Policy fully relate to the certification area of Comarch S.A.S. Additionally, in order to meet the security requirements related to HDS, the company has implemented an appropriate internal Policy.

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

4.3. Code of Conduct of the Comarch Group

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

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

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

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

The Code of Conduct, in force in the Comarch Capital Group has been approved by its Management Board, which undertakes to regularly assess compliance with the principles contained in the Code and update its content based on the applications received.

The Code reflects the ethical values that the Comarch Group shares to and wishes to follow. It provides the employees of the Comarch Group with a pattern of behaviour towards their co-workers, supervisors and clients, partners and local communities, both in business and business-related relationships.

The Comarch Group Code of Conduct is disseminated and popularized through activities of the PR section of Comarch S.A. and Quality, OHS Department.

The full text of Comarch's Code of Conduct can be found at: <http://www.comarch.pl/o-firmie/zrownowazony-biznes/kodeks-etyczny/> (ENG: <https://comarch.com/company/code-of-conduct/>).

All ambiguities, problems related to the interpretation of the content of the Code of Conduct are solved by the Spokesperson on Ethics appointed by the Management Board. Comarch employees are encouraged to submit any comments and modifications related to the content of this Code of Conduct.

The Spokesperson on Ethics is responsible for:

- Supporting employees in compliance with the Code of Conduct,
- Promoting the idea of the Code inside the company,
- Updating the content of the Code,
- Responding to appropriate work on current employees' problems related to the ethics of their business activities.

G.3.2.

As part of the Code of Conduct of the Comarch Capital Group, the following critical risks were identified:

- Risk of violation of ethics, corporate responsibility, respect for human rights and environmental protection,
- Risk of child labour, forced labour, physical or mental coercion,
- Risk of discrimination in all its manifestations,
- Risk related to non-compliance with the rules of fair competition, prevention of bribery, illegal payments and corruption,
- Risk related to non-compliance with legal requirements, international standards regarding human rights and labour standards, internal procedures in the field of ethics.

G.3.1.

Comarch minimizes the risks related to non-compliance with the rules of the Code of Conduct by meeting basic recommendations for the safety of the work environment and adherence to international standards. Employees have the right to expect help and support from the Spokesperson on Ethics in the scope of reported inquiries to a dedicated email address. In addition, employees have the option of making anonymous reports about any violations of ethics through internal paper mail. According to the kept register, in 2020, on the above-mentioned address, no infringements of the Code were received. All submissions are reviewed by an independent committee and qualified as approved or rejected. If the notification is recognized, appropriate steps are taken to resolve it.

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

In the occurrence of any irregularities, including in the dimension of employment, employees have the opportunity to report them to supervisors. In addition, reports of any infringements of working conditions, ethics and environmental protection may be reported by employees to the Spokesperson on Ethics to etyka@comarch.pl or anonymously by internal mail.

The verification of compliance in Comarch is continuous. Employees are periodically trained and may use various paths to report irregularities related to non-compliance with the Comarch Code of Conduct. Other interested parties, e.g. clients, often use the opportunity to verify ethical issues in the form of meetings, audits of the other party and by collecting information through questionnaires. The implementation of the provisions of the Code of Ethics is verified as part of internal audits of the Integrated Management System. During the audits carried out in 2020, no non-compliance in this area was identified.

Comarch does not carry out stationary ethical audits with suppliers, however, as part of the Supplier Sustainability Policy, Comarch supports and encourages suppliers to follow ethical principles in their activities. In the survey of suppliers carried out in 2020, on a question in the survey: Does your company have implemented the Code of Conduct? "YES" was answered by 69% of companies participating in the survey. Suppliers who answered "YES" to this question in 2019 accounted for 52% of respondents.

4.4. Human Rights

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

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

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

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

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

The Comarch Capital Group protects the copyrights of its employees and also, in relation to international standards, respects intellectual property as an individual good, safe from abuse.

The Comarch Capital Group respect to the prohibition of the work of children under 16, forced labour, corporal punishment, mental and physical coercion and insults, as well as the prohibition of sexual harassment, and declares the workplace to be free of such practices.

G.4.6

Both Comarch S.A. as well as the Comarch Group did not identify cases of violation of human rights, child labour or forced labour, including subcontractors. No complaints about respect for human rights were received.

Employees of the Comarch Group companies are trained in the dimension of respect for human rights and in the ethical area during *First Step* training organized by the employer in the first days of work at Comarch and later during IMS trainings carried out every 5 years.

The tables below show the number of people participating in the First Step training sessions, which deal with ethical issues at Comarch S.A. and in the Comarch Group in 2019 - 2020.

Comarch S.A.	2020	2019
number of people participating in training	655	744
total number of training hours	655	744
% of trained employees from among newly hired	81%	81%

Comarch Group	2020	2019
number of people participating in training	667	744
total number of training hours	667	744
% of trained employees from among newly hired	78%	76%

A register of people participating in the Integrated Management System training courses is also kept, the scope of which also covers ethical issues. The data presented below show how many people participated in such training in total. However, there is no division into newly hired persons and persons repeating the training after 5 years. The table below presents the total data for the Comarch Group companies in 2019 - 2020.

Comarch Group	2020	2019
number of people participating in IMS training (people newly hired and repeating the training after 5 years)	1,556	1,495

The Comarch Group companies do not directly employ security employees and maintenance of cleanliness of facilities - this scope of work has been entrusted to specialist external companies. Agreements concluded by Comarch S.A. with these companies contain provisions to provide training in the field of human rights and provide Comarch with statements confirming the completion of training by employees.

4.5. Climate Policy

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

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

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

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

4.6. Sustainable Development and Corporate Social responsibility

In March 2014, Comarch signed the "Declaration of Polish Business for Sustainable Development" and thus made assurance, that will actively work towards the development goals set out in the Vision of Sustainable Development for Polish Business 2050. The content of the Declaration is ten assumptions that will allow in the future, live with dignity and wisely use the limited resources of our planet.

Signing of the Declaration took place with the inauguration of the 3rd Stage of the Sustainable Development Vision project for Polish Business 2050. The participants of the meeting were made aware with the proposals planned for the 3rd Stage of Vision 2050. The signatories of the Declaration have the opportunity to engage in the following working groups: social innovation, sustainable production and consumption, renewable energy sources, greening the new perspective and small and medium enterprises.

The Vision 2,050 project refers to the international initiative taken by the World Business Council for Sustainable Development (WBCSD). Vision 2,050 is a joint project of the Ministry of Economy, Ministry of the Environment, Responsible Business Forum and consulting company PwC. The aim of the undertaken activities is to integrate business in Poland around the idea of sustainable development, to indicate to business representatives the importance of challenges in this area and to strengthen the administration and business dialogue to develop specific solutions to support the implementation of Poland's development goals.

By signing the "Declaration of Polish Business for Sustainable Development," Comarch committed to:

- Support its activities for broad cooperation, innovative thinking and education of both your own employees and society,
- Conduct its business based on trust and dialogue,
- Cooperate with academic centres and schools in the field of education of future employees,
- Create conditions and development opportunities for employees,
- To promote and support the implementation of new technological solutions,

- Create infrastructure and conduct investments based on dialogue and in accordance with the principles of sustainable development,
- Take action to reduce its negative impact on the environment,
- Introduce a solution that reduce energy consumption, both in the implementation of new technological solutions, process optimization and education,
- Conduct a dialogue with the government and share its experiences on issues important to entrepreneurs and the economy,
- Raise the level of ethics in business, including in relations with all groups of stakeholders.

The risk for the above Declaration is failure to meet its assumptions. Comarch is successively striving to meet them through effective implementation of processes within the Integrated Management System and implementation of all the above-described policies.

S.9.1., S.9.3., S.9.4., S.9.5., S.9.6.

Comarch Capital Group from the beginning of its activity has been widely involved in the implementation of the concept of Corporate Social Responsibility (CSR), promoting the idea of creating a broad social platform. Also important are activities that promote sport, the latest IT technologies, healthy lifestyle and environmental protection, help animals, as well as involvement in culture and supporting initiatives of local communities.

CSR foundations in Comarch are the basis for activities in the area of corporate social responsibility is the Code of Conduct adopted and functioning in the company. Due to the high activity of the Comarch Group in the area of Corporate Social Responsibility, work has started on a comprehensive CSR policy for the Comarch Group, regulating the issues described above. The detailed CSR report in the Comarch Group is documented and presented every year in the Corporate Social Responsibility Report of the Comarch Group, which is posted on the Internet at: <http://www.comarch.pl/o-firmie/zrownowazony-biznes/csr/> (<https://www.comarch.com/company/corporate-social-responsibility/>).

Every year, the Comarch Group observes an increase in employee involvement in actions undertaken in the area of CSR. The email address csr@comarch.pl was created for communication, the possibility of reporting new issues in this area.

The Comarch Group from the beginning of its activity has been widely involved in social activities, propagating the idea of creating a broad social platform, on the grounds of which sport and the latest IT technologies are promoted. Also important are activities that promote a healthy lifestyle and environmental protection, help animals, as well as involvement in culture and supporting initiatives of local communities.

CSR foundations in Comarch are the basis for activities in the area of corporate social responsibility is the Code of Conduct adopted and functioning in the company. Due to the high activity of the Comarch Group in the area of Corporate Social Responsibility, work has started on a comprehensive CSR policy for the Comarch Group, regulating the issues described above. The detailed CSR report in the Comarch Group is documented and presented every year in the Corporate Social Responsibility Report of the Comarch Group, which is posted on the Internet at: <http://www.comarch.pl/o-firmie/zrownowazony-biznes/csr/> (ENG: <https://www.comarch.com/company/corporate-social-responsibility/>).

The email address csr@comarch.pl was created for communication, the possibility of reporting new issues in this area.

4.7. Prevention of Corruption

[dimensions: society, employment, prevention of corruption]

The Comarch Group respects the principles of fair competition, prevention of bribery, illegal payments and corruption.

The Anti-Corruption Policy, implemented in the Comarch Group, is a set of obligatory rules and standards of conduct aimed at preventing and responding to activities that may be marked by corruption. The Anti-Corruption Policy sets out how to deal with a threat of corruption or corrupt behaviour.

The Anti-Corruption Policy complements the provisions of national and international law in the field of anti-corruption, and the obligation to comply with these provisions rests with each employee, co-worker and representative of the Comarch Group.

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

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

The Policy is complemented by the Comarch Group Anti-Corruption Guidelines, which contain detailed rules of conduct for employees, co-workers and representatives of the Comarch Group, aimed at preventing the occurrence of corruption risks and responding to any symptoms of corruption.

G.3.1.

Suspected violations of the principles of the Anti-Corruption Policy or other legal regulations may be reported by employees to etyka@comarch.pl or anonymously to the Spokesperson on Ethics.

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

S.10.1

The Comarch Group has assessed its operations in terms of the potential for corruption and is taking measures to minimise the associated risks, including by implementing procedures to prevent corrupt behaviour, as well as by providing training to employees who may come into contact with such behaviour.

G.3.2.

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

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

Internal financial and accounting processes are built based on IT systems that require multi-level decisions and verifications. Access to key data and functions is limited and supervised, and activities are logged. All this is designed to prevent unauthorized transactions by employees.

Absence of tolerance for corruption and compliance of the principles of fair competition are also contained in point V of the [Comarch Capital Group's Code of Conduct](#).

S.10.3.

No confirmed occurrences of corruption.

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

S.10.2. No occurrences of corruption-related behaviours were reported.

4.8. Corporate Governance

G.2.1., G.2.3.

Corporate governance is a set of rules of conduct, addressed both to the bodies of companies and members of these bodies, as well as to majority and minority shareholders. The corporate governance principles refer to the broadly understood management of the Company. Comarch S.A. is subject to a new set of corporate governance principles called "Good Practices of WSE Listed Companies 2016", adopted by the Warsaw Stock Exchange Board in Warsaw in 2015. On the 29th of March, 2021, the Stock Exchange Supervisory Board, at the request of the Stock Exchange Management Board, adopted new corporate governance rules for companies listed on the WSE Main Market - "Good Practices of WSE Listed Companies 2021", which will enter into force on the 1st of July, 2021.

Good Practices of WSE Listed Companies is the subject of annual reports on conduct in compliance with corporate governance principles drawn up by listed companies. Attached to the annual report made public on 30th of April, 2021, the Management Board of Comarch S.A. submitted a statement on the application of corporate governance principles by Comarch S.A. in 2020.

The Management Board and the Supervisory Board of Comarch S.A. make every effort to comply with most of the principles of Good Practices of WSE Listed Companies in the scope covered by the principle of "comply or explain" - which is based on providing the market by the company with clear information about the breach of practice. In 2019, as in previous years, Comarch S.A. did not comply with the recommendation to use the right to vote during the general meeting personally or through a proxy, outside the venue of the general meeting, using electronic means of communication. The company also does not apply a part of the policy of remuneration. Detailed information on this subject can be found in the Statement regarding the acceptance of corporate governance principles in Comarch S.A. published in 2020.

In accordance with the corporate governance principles and the Commercial Companies Code in Comarch S.A. the Supervisory Board operates together with a separate audit committee.

The Supervisory Board supervises the ongoing operations of the Company and the Group, in particular through:

- monitoring and analysing of the financial and organizational situation,
- evaluation of the strategy implementation by the Management Board,
- setting business goals for members of the Management Board and assessing their implementation,
- evaluation of the operations of selected business areas
- analysis and assessment of the risk related to the activity,
- supervision over the Export Control System,
- assessment and approval of financial statements.

The tasks of the Audit Committee cover in particular:

- supervising the reporting process and financial auditing,
- monitoring the effectiveness of export control systems, internal audit and risk management,
- verification of the independence of the expert auditor and the entity authorized to audit financial statements.

The full text of the Statement regarding the acceptance of the corporate governance principles is also available at: www.comarch.pl/relacje-inwestorskie/lad-korporacyjny (ENG: <https://comarch.com/investors/corporate-governance/>).

5. Contractors

5.1. Managing Relations with Contractors

G.1.2., S.4.12., S.6.4., S.7.4., S.7.6., S.8.4., S.15.1., S.15.3., S.15.4.

Within the organizational structure of the Comarch Group there is a Contractor Management Department involved in verifying and analysing contractors.

The main competences of this department include:

- managing of the database of system counterparties operating within the Comarch Group (verification, analysis, collection of documents),
- managing of access to data and analyses of external companies from the business information industry,
- preparing of reports (a broad spectrum) about contractors of the Comarch Group for the needs of other departments or auditors,
- participating in suppliers' evaluation and selection procedures.

5.2. Suppliers

Characteristics of Suppliers

The main sources of supply for Comarch S.A. and the Comarch Capital Group are international concerns, i.e. manufacturers of computer hardware and software as well as electronics, which are used for the equipment production. Most orders are made through purchases in local branches and local distribution. The activity of the Comarch Group is not dependent on a single supplier. In 2020, as in the previous year, none of the contractors provided products or services with a value exceeding 10% of the Comarch Group's sales revenues.

The Comarch Capital Group has an enormous range of products and services, of which the implementation requires cooperation with suppliers, which complement the portfolio of services and own licenses and allow the extension of the offer with third party products.

The portfolio of third-party products includes primarily well-known and internationally recognized brands and manufacturers. Comarch cooperates with suppliers mainly through local authorized distributors that help in solving of logistic problems as well as organizing of fast delivery to the customer.

According to the geographical structure of operations, the Comarch Group distinguishes the following market segments: Poland, Europe-DACH, Europe-other, America and other countries. Local suppliers are defined as having their headquarters in a country where the Comarch Group operates.

The following tables present the share of the value of purchases from suppliers from individual locations in Comarch S.A. and the Comarch Group in 2019 - 2020.

Suppliers of Comarch S.A. - share of purchase value from suppliers in each location	2020	2019
Poland	87%	83%
DACH	4%	4%
Europa-other	7%	11%
Americas	1%	1%
Other	1%	1%

Comarch business region - share of purchase value from suppliers in each location	Local suppliers %		Foreign suppliers %	
	2020	2019	2020	2019
Poland	98%	98%	2%	2%
DACH	46%	51%	54%	49%
Europa-other	33%	38%	67%	62%
Americas	56%	54%	44%	46%
Other	43%	33%	57%	67%

Rules to be Observed by Suppliers

The Comarch Group makes every effort to ensure that public-law and financial liabilities, liabilities towards employees and suppliers from outside the Comarch Group, are settled in a timely manner. As in the previous year, the rate of payments received on-time in Comarch S.A. amounted to 95% of the value of liabilities and 94% in the Comarch Group.

The Comarch Group, a global integrator and creator of innovative solutions and information systems, in the care of the quality of its products and services, attaches great importance to the careful selection of suppliers.

The main selection criteria are: price, time of order fulfilment, timeliness and the supplier's opinion and position on the market. The evaluation of the cooperation so far also has an impact on the choice of the supplier to execute orders. However, consideration is also given to aspects related to respect for human rights suppliers, employment practices, the impact of their activities on the local community and the environment.

For years, actively working for sustainable development, the Comarch Group encourages suppliers to follow ethical principles, social responsibility and manage environmental impact in a responsible manner. Hence, based on international recommendations contained among others in the Universal Declaration of Human Rights of the UN, International Labour Standards of the ILO, ISO standards and many others, the Supplier Sustainability Policy was developed.

G.4.7, S.4.11., S.7.3., S.8.3., E.7.5.

Below is presented what part of the contracts signed in previous years by the Comarch Group companies with software and computer hardware manufacturers and key subcontractors (those with which the

turnover exceeds PLN 100 thousand) contain provisions regarding ethical, anti-corruption, OHS standards and respect for human rights. The companies with which the Comarch Group cooperates are large international corporations, where great importance is attached to compliance with the requirements related to ethics, regulations on OHS, human rights, including the prohibition of child labour or forced labour.

The Comarch Group analyses and selects suppliers to promote those companies that are guided by the principles of ethics, social responsibility, human rights and environmental protection.

The following tables present the percentage of contracts signed in 2019-2020 by Comarch S.A. and companies of the Comarch Group with producers of software and computer hardware, as well as key subcontractors, which contain provisions on ethical, anti-corruption and OHS standards and respect for human rights.

Key Manufacturers and	Ethics	OHS	Human rights	Respect for the environment	Human rights including the prohibition of child
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Subcontractors in 2020					labour or forced labour
Comarch S.A.	80.0%	57.7%	65.1%	57.7%	65.1%
Comarch Group	81.1%	59.3%	66.3%	59.3%	66.3%

Key Manufacturers and Subcontractors in 2019	Ethics	OHS	Human rights	Respect for the environment	Human rights including the prohibition of child labour or forced labour
Comarch S.A.	86.0%	70.0%	73.8%	70.0%	73.8%
Comarch Group	86.3%	69.5%	73.1%	69.5%	73.1%

Assessment of Cooperation with Suppliers

Companies applying for the status of the Comarch Group supplier receive a questionnaire to complete, which contains questions about the scope of implemented and certified management systems, regarding occupational health and safety, social responsibility, care for environmental protection, energy management and information protection. Answers provided in the questionnaire are validated, and then the company is qualified by the system to one of four categories of suppliers: I - chosen for cooperation in the first place, II - second order, III - reserve, IV - risky. The highest, first category is given to those companies that declare adherence to the highest standards.

In accordance with the supplier analysis procedure, questionnaires are also sent regularly every year to companies that completed the questionnaire in the previous years in case the suppliers noticed changes in the areas covered by the survey in their organization. In 2019, 363 surveys (including periodic surveys) were sent, completed by 33 suppliers. In 2020, 487 questionnaires (including periodic ones) were sent, completed by 29 suppliers.

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

The following table presents the categories assigned to suppliers assessing the quality of cooperation in 2019-2020.

Categories assigned to suppliers	I	II	III	IV
2020	48%	51%	1%	0%
2019	79%	18%	2%	1%

The categories were assigned based on the results of the evaluation of cooperation with 284 entities in 2019 and 345 entities in 2020.

Assessment of
cooperation in 2020Assessment of
cooperation in 2019

The results of supplier analysis are collected in the IT system, which allows quick generation of cross-sectional reports and conducting periodic monitoring.

5.3. Customers

Characteristics of Customers

S.15.2.

Due to the type of IT systems offered by the Comarch Group, the main group of recipients are medium and large enterprises, which are the largest recipients of advanced IT solutions around the world. Most of the Comarch Group's products are targeted at a specific group of recipients, while IT services, due to their universal nature, are offered to each group of recipients. The Comarch Group's offer is intended for both Polish and foreign customers. For many years, one of the main strategic goals of the Comarch Group has been the development of sales of an increasing number of products on foreign markets, in particular in Western Europe, both Americas and Asia. Sales of the Comarch Group are highly diversified and there is no dependence on one recipient. As in Comarch S.A., in the Comarch Group in 2020 sales to any of the contractors did not exceed 10% of total sales.

The most important principles of the Comarch Group are: responsibility for the clients' success, as well as respect and openness to their needs. The Comarch Group provides its clients with innovative IT products of the highest quality, thanks to high skills, experience and competence of employees, cooperation with leading research and science centres both in Poland and abroad. Comarch makes every effort to ensure that the delivered IT solutions meet the highest standards and customer expectations.

In terms of contacts with public sector entities (central and local government administration, municipal companies, State Treasury companies, public health care centres), the provisions of the Public Procurement Act of 29th of January, 2004 (Journal of Laws of 2019, item. 2020, of 2020, item. 1086). These provisions regulate the manner of communication with the ordering party during the tender procedure, the scope of activities that may be undertaken by the parties to the proceedings and legal protection measures.

Security in International Business

In order to ensure control and security of foreign trade of goods, technologies and services of strategic importance for the State's security, the Comarch Group has implemented an Export Control System Policy that ensures the application of international and domestic standards and legal requirements. Comarch does not sell products that are banned or cause controversy among stakeholders.

Safety of Products and Consumers

The Comarch Group is a producer of IT solutions and an integrator. Since 1993 Comarch has been helping clients to achieve greater profitability and profit from modern products and solutions, using a wide range of tools complemented by top quality services. Comarch has gained experience in the most important industries (in telecommunications, finance, banking and insurance, trade and services, IT infrastructure, public administration, industry, health care, as well as small and medium-sized

enterprises) thanks to projects carried out for the largest Polish and world brands <https://www.comarch.pl/o-firmie/profil/> (ENG: <https://www.comarch.com/company/comarch-at-a-glance/>).

The Comarch Group is also a manufacturer of electronic devices, including medical devices. The Comarch Group makes every effort to ensure that the products introduced meet the needs of the market and consumers, while being safe. Manufactured products shall, where applicable, be subject to conformity assessment as defined in the applicable regulatory requirements, including the required tests and trials for safety and performance. The Comarch Group also provides reliable information on the intended use of the offered products; it also informs about the risks associated with the products during their normal or reasonably foreseeable use during the life of the product, taking into account situations where the benefits of using the product outweigh the possible risks.

When producing electronics, the Comarch Group also takes into account the requirements related to environmental protection.

In 2020, neither Comarch S.A. nor any other company in the Comarch Group was penalised for non-compliance with laws and regulations on the provision and use of products and services.

In order to strengthen the quality and safety assurance of the offered products, Comarch S.A. has implemented and certified the Integrated Management System described in section [4.1.](#)

S.11.1.

There have been no instances of breaches of procedures regarding the safety of products and services.

S.11.3., S.12.3.

No penalties have been imposed on Comarch S.A. or Comarch Group companies for non-compliance with laws and regulations on issues related to customer safety, reliability and ethics of marketing communication.

S.12.1.

The Comarch Group did not report incidents of non-compliance with regulations and voluntary codes concerning marketing communication (including advertising, promotion, sponsorship).

S.13.1., S.13.2., S.13.3.

Due to the entry into force of the regulation on personal data protection in 2018, the Comarch Group has implemented a number of personal data protection procedures supplementing the policies and procedures based on ISO standards that have already existed in the company for many years.

In accordance with the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of the 27th of April, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and the repeal of Directive 95/46 /WE (RODO), the Personal Data Inspector has been appointed and a number of registers required by the provisions of the GDPR are kept, including a register of personal data breaches - internal record of personal data breaches.

Both in 2019 and 2020, there were no administrative proceedings conducted against Comarch Group companies (e.g. UODO), as well as no penalties have been imposed for non-compliance with the law and regulations on issues related to personal data protection (broken down into legally binding and non-binding ones).

In 2020, eleven infringements of personal data protection in the Comarch Group were reported which, after analysis, did not need to be reported to the supervisory authority due to the low probability that they would result in a risk of violation of rights or freedoms of natural persons.

The number of infringements recorded in the internal register in the last two years fluctuates around a dozen cases per year and remains at a similar, constant level. The continuous increase in employee awareness in the area of personal data protection, in connection with the ongoing training and instructions implemented on an ongoing basis, translates into not duplicating existing violations, better detectability, and thus also affects the prevention of further infringement.

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

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

S.15.6.

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

S.14.1., S.14.3.

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

Customer Satisfaction Survey

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

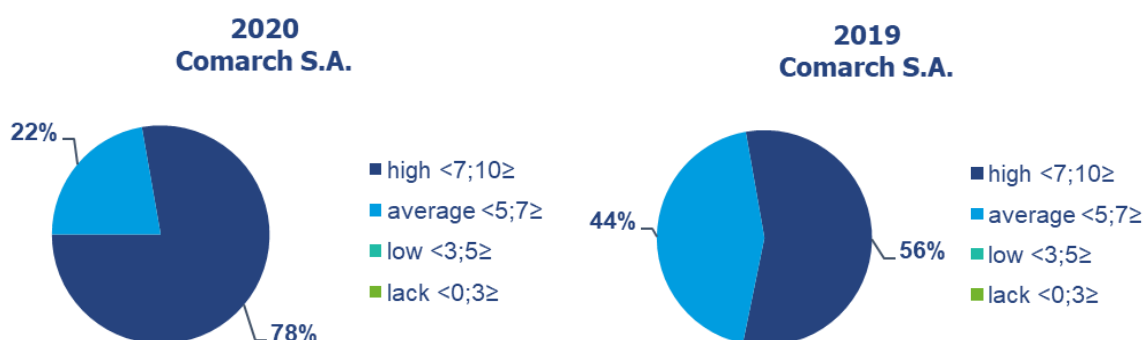
The basic element of the survey is a short on-line questionnaire sent to our clients, which contains closed questions with grades 1-10 and open-ended questions. Respondents are divided into three groups of clients: management, project managers and users.

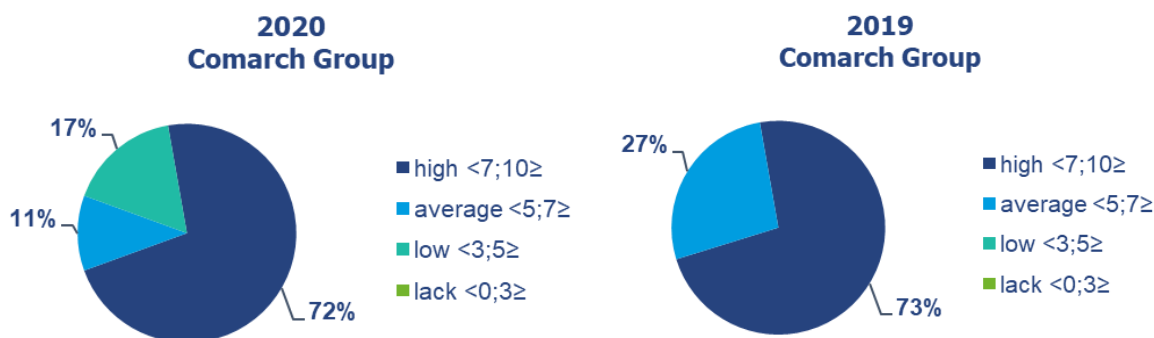
Thanks to the information obtained from the surveys, we can correctly identify and prioritize actions aimed at providing our clients with maximum satisfaction from cooperation with the Comarch Group.

Phases of customer satisfaction survey:

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

The following pie graphs show how the overall satisfaction with cooperation with the Comarch Group in 2019-2020 was shaped. The indicator of average customer satisfaction consisted of, among others, general satisfaction with cooperation with the Comarch Group, willingness to recommend the Comarch Group products/services to another company, willingness to purchase Comarch products/services in the future, satisfaction with the Comarch Group prices compared to their quality, the way how the Comarch Group conducts business talks, negotiations and signing of contracts.





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

The highest rated aspects of Comarch S.A.'s and companies of the Comarch Group customer satisfaction are presented below:

- High personal culture and the ability to communicate,
- Expertise of employees,
- High quality of services provided,
- Customer focus,
- Rapid response to the notification,
- Flexibility in adapting software to customer needs,
- Product quality.

6. Human Resources

6.1. Employment in the Comarch Group in 2016-2020

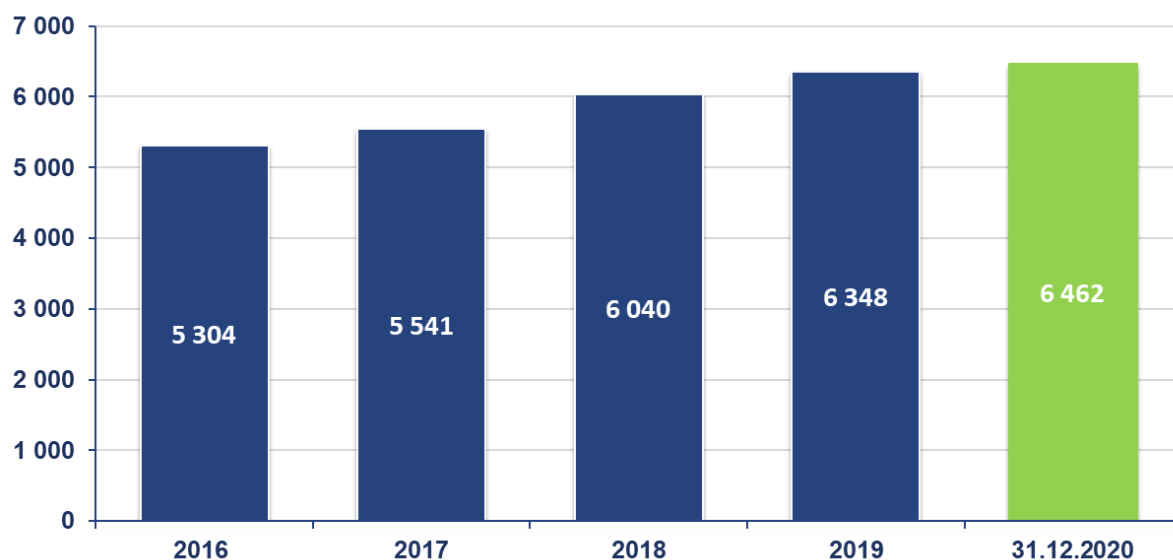
Number of Employees

S.2.6., S.2.7., S.2.8., S.3.2., S.3.6.

The basic factor limiting the production capacity are human resources. To constantly invest in new products and IT technologies, the company needs employees with appropriate education and a wide range of competences. The company flexibly manages employee teams by continuously optimizing the allocation of resources in current commercial projects and internal R&D projects (construction of new products and updating of existing software not directly related to contracts with customers), using proprietary IT solutions for this purpose. As a result, the use of human resources is close to 100%. The Group diversifies the risk of restrictions on the availability of human resources by operating in 20 branches located in urban centres in Poland. As at 31st of December, 2020, 3,639 employees were employed in Krakow, 2,239 in other cities in Poland and 584 outside of Poland.

As at 31st of December, 2020 at Comarch S.A. 5,006 people were employed compared to 4,979 people employed as at 31st of December, 2019, while in the entire Capital Group the number of employees increased to 6,462 persons, compared to 6,348 people as at 31st of December, 2019.

The chart below shows the number of people employed in the Comarch Group in 2016 - 2020.



The tables below present the average number of people employed at Comarch S.A. and in the Comarch Group in 2016 - 2020.

Average number of employees in Comarch S.A.	2020	2019	2018	2017	2016
Employment agreement	4,117	4,057	3,753	3,492	3,416
Other form of employment	925	930	934	844	888
Total	5,042	4,987	4,687	4,336	4,304

Average number of employees in Comarch S.A.	2020	2019	2018	2017	2016
Production employees and technical consultants	4,395	4,330	4,052	3,733	3,698
Marketing and sales	176	180	168	161	179
Management and administrative	413	414	407	372	353
Other	58	63	60	70	74
Total	5,042	4,987	4,687	4,336	4,304

Average number of employees in Comarch Group	2020	2019	2018	2017	2016
Employment agreement	5,119	5,087	4,727	4,393	4,323
Other form of employment	1,383	1,361	1,364	1,245	1,276
Total	6,502	6,448	6,091	5,638	5,599

Average number of employees in Comarch Group	2020	2019	2018	2017	2016
Production employees and technical consultants	5,136	5,103	4,797	4,369	4,342
Marketing and sales	336	321	298	293	336

Management and administrative	499	499	495	458	434
Other	531	525	501	518	487
Total	6,502	6,448	6,091	5,638	5,599

Due to the constant development of its activities, both Comarch S.A. and the Comarch Group systematically increase the level of employment. Employment dynamics in 2020 was slightly lower than in previous years, which was caused by the ongoing Covid-19 pandemic.

Employment Rotation

S.2.2., S.2.3.

In 2020, the rotation among employees of Comarch S.A. and the Comarch Group did not differ from the previous years and remained at the standard level for the industry. The company strives to minimize employee turnover, especially among those keys to Comarch Group's activity.

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

Contracts under which Work is Provided

S.2.1., S.2.4.

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

The tables below present the number of people employed at Comarch S.A. and in the Comarch Group in the years 2019 - 2020 according to the type of contract under which the work is provided.

		Comarch S.A.		Comarch Group	
Type of employment	Time	2020	2019	2020	2019
Open-ended contract	Part Time	172	183	160	151
	Full Time	2,469	2,182	3,256	2,898
	Total	2,641	2,365	3,416	3,049
Fixed-term contract	Part Time	35	74	50	84
	Full Time	1,409	1,613	1,647	1,925
	Total	1,444	1,687	1,697	2,009
Total		4,085	4,052	5,113	5,058

		Comarch S.A.		Comarch Group	
Type of employment	Age	2020	2019	2020	2019
Open-ended contract	Under 30 years	527	476	877	574
	30-50 years	2,072	1,841	2,380	2,318
	over 50 years	42	48	159	157
	Total	2,641	2,365	3,416	3,049
Fixed-term contract	Under 30 years	1,115	1,244	1,256	1,382
	30-50 years	319	430	414	588

	over 50 years	10	13	27	39
	Total	1,444	1,687	1,697	2,009
Total		4,085	4,052	5,113	5,058

Type of employment	Sex	Comarch S.A.		Comarch Group	
		2020	2019	2020	2019
Open-ended contract	Women	782	703	1,064	954
	Men	1,859	1,662	2,352	2,095
	Total	2,641	2,365	3,416	3,049
Fixed-term contract	Women	462	524	575	642
	Men	982	1,163	1,122	1,367
	Total	1,444	1,687	1,697	2,009
Other forms of employment	Women	111	104	286	260
	Men	810	823	1,063	1,030
	Total	921	927	1,349	1,290
Total		5,006	4,979	6,462	6,348

S.2.5.

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

In 2019-2020, all employees employed under a contract of employment at Comarch S.A. and in the Comarch Group were paid higher than the minimum wage.

Employment Structure by Voivodships and Countries

The table below presents the number of jobs created by Comarch S.A. and Polish companies of the Comarch Group in 2019 - 2020 in individual provinces of Poland as of the last day of the year.

POLAND voivodeship	Comarch S.A.		Polish companies of the Comarch Group	
	31 December 2020	31 December 2019	31 December 2020	31 December 2019
dolnośląskie	235	216	238	221
kujawsko-pomorskie	26	33	27	33
lubelskie	176	167	183	173
lubuskie	4	-	4	-
łódzkie	379	388	386	400
małopolskie	3,031	3,036	3,660	3,561
mazowieckie	278	289	338	337

opolskie	1	1	1	1
podkarpackie	60	50	66	55
podlaskie	22	26	36	38
pomorskie	80	75	113	101
śląskie	448	441	550	544
świętokrzyskie	44	48	47	50
warmińsko-mazurskie	1	1	1	1
wielkopolskie	221	208	226	211
zachodniopomorskie	-	-	2	2
Total	5,006	4,979	5,878	5,728

Comarch S.A. and the Comarch Group diversifies the risk of restrictions on the availability of human resources by operating in 20 branches located in urban centres in Poland. By opening new branches and creating new workplaces, Comarch contributes to the development of the regions in which it operates.

The table below presents the number of jobs created by foreign companies of the Comarch Group in 2019 - 2020 in individual countries as of the last day of the year.

FOREIGN COUNTRIES			
country	31 December 2020	31 December 2019	
Saudi Arabia	1	2	
Argentina	-	3	
Australia	1	-	
Austria	11	11	
Belgium	23	21	
Brazil	9	20	
Chile	9	27	
Finland	-	1	
France	110	80	
Spain	7	12	
Netherlands	3	3	
Japan	4	1	
Columbia	3	14	
South Korea	2	1	
Malaysia	-	3	
Germany	232	246	
Panama	4	4	
Peru	1	9	
Russia	3	2	
United States of America	18	21	
Switzerland	20	20	
Sweden	1	1	
Thailand	14	11	

Turkey	1	2
Ukraine	65	68
United Kingdom	13	9
Italy	20	18
United Arab Emirates	9	10
Total	584	620

A large part of the Comarch Group's revenue comes from foreign markets, so there is a need to obtain human resources also outside Poland. Foreign companies adjust the number of employees to the current contract demand by setting up new subsidiaries and creating new locations around the world. Although in a smaller share than in Poland, however, also abroad Comarch contributes in this way to the development of the regions in which it operates.

Employment Structure by Sex and Age

Composition of Management and Supervisory Bodies by Gender and Age

All representatives of Comarch S.A.'s managing bodies are citizens of Poland. The table below presents the numerical breakdown of supervisory authorities by diversity category in 2019-2020.

Year	Management body	Age	Woman	Man	Total
31 December 2020	Supervisory Board	under 30 years	-	-	-
		30-50 years	2	-	2
		over 50 years	2	3	5
		Total	4	3	7
	Management Board	Under 30 years	-	-	-
		30-50 years	-	5	5
		over 50 years	-	1	1
		Total	-	6	6
	Total		4	9	13
31 December 2019	Supervisory Board	under 30 years	-	-	-
		30-50 years	2	-	2
		over 50 years	2	3	5
		Total	4	3	7
	Management Board	Under 30 years	-	-	-
		30-50 years	-	6	6
		over 50 years	-	1	1
		Total	-	7	7
	Total		4	10	14

The representatives of the managing bodies of the Comarch Group companies are citizens of various countries. The table below presents the structure of management and supervisory bodies by diversity category in 2019-2020.

Year	Management body	Age	Woman	Man	Total
31 December 2020	Supervisory Board	under 30 years	-	-	-
		30-50 years	3	22	25
		over 50 years	4	12	16
		Total	7	34	41
	Management Board	under 30 years	1	-	1
		30-50 years	12	113	125
		over 50 years	4	23	27
		Total	17	136	153
	Total		24	170	194
31 December 2019	Supervisory Board	under 30 years	-	-	-
		30-50 years	2	21	23
		over 50 years	5	12	17
		Total	7	33	40
	Management Board	under 30 years	-	-	-
		30-50 years	12	113	125
		over 50 years	4	23	27
		Total	16	136	152
	Total		23	169	192

Other Employees

Below is a breakdown of employees employed under employment contracts at Comarch S.A. and Comarch Group by type of work, gender, age and citizenship.

Comarch Group	2020			2019		
Categories of employees *	Woman	Man	Total	Woman	Man	Total
administration	256	73	329	257	71	328
managerial	138	449	587	138	437	575
production	784	2,221	3,005	763	2,222	2,985
other	66	98	164	69	95	164

Total	1,244	2,841	4,085	1,227	2,825	4,052
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**employed on the basis of employment contracts*

Comarch S.A.	2020			2019		
Categories of employees*	Woman	Man	Total	Woman	Man	Total
administration	380	117	497	374	121	495
managerial	173	524	697	169	506	675
production	936	2,648	3,584	917	2,656	3,573
other	150	185	335	136	179	315
Total	1,639	3,474	5,113	1,596	3,462	5,058

**employed on the basis of employment contracts*

Men constitute the dominant group among employees in Comarch S.A. and in the Comarch Group. This is in line with the specificity of the IT industry.

Comarch S.A.	2020				2019			
Categories of employees*	under 30 y/o	30-50 y/o	over 50 y/o	Total	under 30 y/o	30-50 y/o	over 50 y/o	Total
administration	120	195	14	329	139	173	16	328
managerial	32	544	11	587	37	524	14	575
production	1,432	1,548	25	3,005	1,481	1,475	29	2,985
other	58	104	2	164	63	99	2	164
Total	1,642	2,391	52	4,085	1,720	2,271	61	4,052

**employed on the basis of employment contracts*

Comarch Group	2020				2019			
Categories of employees*	under 30 y/o	30-50 y/o	over 50 y/o	Total	under 30 y/o	30-50 y/o	over 50 y/o	Total
administration	195	266	36	497	172	280	45	497
managerial	81	621	19	721	36	589	20	645
production	1,713	1,707	53	3,473	1,543	1,480	39	3,062
other	144	200	78	422	74	359	77	510
Total	2,133	2,794	186	5,113	1,825	2,708	181	4,714

**employed on the basis of employment contracts*

In 2020, the number of people employed in the age group under 30 increased the fastest.

Categories of employees*	2020				2019			
	Citizens of Poland	Citizens of other European countries	Citizens of other countries	Total	Citizens of Poland	Citizens of other European countries	Citizens of other countries	Total
administration	326	3	0	329	325	3	0	328
managerial	583	4	0	587	570	5	0	575
production	2,943	54	8	3,005	2,921	54	10	2,985
other	154	6	4	164	157	4	3	164
Total	4,006	67	12	4,085	3,973	66	13	4,052

*employed on the basis of employment contracts

Categories of employees*	2020				2019			
	Citizens of Poland	Citizens of other European countries	Citizens of other countries	Total	Citizens of Poland	Citizens of other European countries	Citizens of other countries	Total
administration	429	54	14	497	426	53	16	495
managerial	644	70	28	742	625	59	29	713
production	3,241	87	25	3,353	3,186	80	30	3,296
other	228	206	87	521	224	197	133	554
Total	4,542	417	154	5,113	4,461	389	208	5,058

*employed on the basis of employment contracts

The Comarch Group employs many employees from outside Poland, thus entering the specificity of the IT industry, where the international work environment and multiculturalism of the employee teams are the standard. The share of employees from outside Poland decreased slightly in 2020 compared to the last year's level.

Remuneration

S.2.9

The table below presents the ratio of the average basic salary of women to the average basic salary of men by employee category in the years 2019-2020.

Categories of employees	Comarch S.A.		Comarch Group	
	2020	2019	2020	2019
administration	90%	94%	88%	85%
managerial	63%	64%	70%	69%
production	76%	76%	88%	72%
other	74%	78%	76%	80%

The average salary of women in Comarch S.A. and in the Comarch Group is lower than the average salary of men. This is mainly due to the fact that the employed women have shorter experience in the IT industry and shorter work experience in Comarch, which affects the level of remuneration. In the

group of employees, where experience in the industry and seniority are similar for women and men (administration), the level of earnings is on similar level.

Holidays and Other Employee Issues

S.2.14.

Comarch S.A. and the Comarch Group supports employees who decide to take parentage and provides the opportunity to return to work after using leaves related to maternity / paternity. The vast majority of employees return to their previously occupied positions after maternity / paternity leave. Comarch S.A. and the Comarch Group make it possible to flexibly adjust the working time to the needs of parenting. The table below presents data on return to work and retention of employment after maternity / paternity leave by employees, broken down by gender in 2019-2020.

	Sex	Comarch S.A.		Comarch Group	
		2020	2019	2020	2019
The number of people who took of maternity/paternity leave	Woman	93	97	127	132
	Men	5	2	15	14
	Total	98	99	142	146
The number of people who returned to work after the maternity/paternity leave	Woman	91	80	113	97
	Man	5	1	14	12
	Total	96	81	127	109
Return to work rate ^{a)}	Woman	92%	96%	89%	73%
	Man	83%	100%	100%	100%
Number of people who returned to work after maternity/paternity leave and was still employed for 12 months after returning to work	Woman	70	63	89	75
	Man	1	4	7	10
	Total	71	67	96	85
Employment maintenance rate ^{b)}	Woman	88%	86%	83%	84%
	Man	100%	57%	66%	53%

a) Return to work rate - the ratio of the total number of employees who returned to work after maternity/paternity leave to the total number of employees who should return to work after maternity/paternity leave

b) Employment maintenance rate - the ratio of the total number of employees who maintained their job 12 months after returning to work after maternity/paternity leave to the total number of employees returning from maternity/paternity leave in previous reporting periods

The minimum period of standard notice given to employees and their selected representatives before the implementation of important operational changes that may have a significant impact on the employees of Polish companies of the Comarch Group is 4 weeks. Due to the lack of collective agreements in the Polish companies of the Comarch Group, the period of notice and the need for consultation and negotiations are not included in collective agreements. In the foreign companies of the Comarch Group, the periods of notice differ and depend on many factors, i.e. legal regulations of a given country, seniority or type of contract.

In accordance with the applicable law of Comarch S.A., iComarch24 S.A., Geopolis sp. z o.o., Comarch Polska S.A., Comarch Healthcare S.A., CA Consulting S.A. and Comarch Infrastruktura S.A. implemented Employee Capital Plans managed by Aviva Specjalistyczny Fundusz Otwarty PPK managed by Aviva Investors TFI S.A. In 2020, the agreement for running and managing Employee Capital Plans was signed by MKS Cracovia SSA, while in 2021 the contracts were signed by Comarch Finance Connect Sp. z o.o. and Comarch Cloud S.A. Employees of some foreign companies of the Comarch Group participate in pension programs appropriate for given countries.

S.2.15.

In Polish companies of the Comarch Group, additional medical packages are a benefit available to people employed under an employment contract (regardless of the duration of the contract and the number of full-time jobs). In foreign companies of the Comarch Group, additional medical packages are provided taking into account local regulations and market practices in this area.

S.2.13

The table below presents the total amount of annual contributions to PFRON in thousands of PLN in the years 2019 - 2020.

000' PLN	2020	2019
Comarch S.A.	2,486	2,305
Comarch Group	3,021	2,769

S.3.1., S.3.2, S.3.3, S.3.5, S.3.6, S.4.10.

There are no collective labour agreements or trade unions in the Polish companies of the Comarch Group. In Comarch S.A., on the other hand, a group

of 7 Employee Representatives was appointed, who operate on the basis of the Agreement concluded in 2006 and the Act of 7th of April, 2006 on informing employees and carrying out consultations with them. Employee Representatives are selected from among all employees employed under an employment contract. The selection is made by the Company's employees every 2 years. The last elections were held in June 2020. The next elections are planned for 2022. Elected Employee Representatives are part of accident teams and participate in consultations conducted by the Employer. The most important of them included consultations on the approval of the OHS policy in the field of health and safety and the environment, changes in the work regulations (2016), the selection of the institution managing the Employee Capital Plans (PPK) (2019) and the rules of operation and work during a pandemic (2020).

Employees of Polish subsidiaries did not express their willingness to appoint their representatives.

There are no trade unions in the foreign companies of the Comarch Group in the DACH region, but there are works councils. Employees elect a works council for a given location to which all employees report. The election of a works council is not compulsory and the decision is made by the employees. Participation in elections is limited by the number of years of service. Elections are held every few years, this is regulated by the provisions of the act.

Works councils in the DACH area:

- Comarch Solutions GmbH – Innsbruck, the company is also subject to the tariff agreement,
- Comarch AG – Munich,
- Comarch Software und Beratung AG - all company locations.

Works councils also function in both French companies, i.e. Comarch SAS and Comarch R&D SARL.

There are no trade unions in Comarch SRL in Italy, while employees are subject to a national collective labour contract, which was created to regulate relations between employees and employers. Collective as it affects all employees in the contractual sector and national as it applies to all companies that are located in Italy. It regulates the employment relationship, e.g. schedule, qualifications and duties, remuneration, etc. Comarch SRL is subject to the 'CCNL del commercio' (trade).

Similar sectoral agreements regulating issues such as the minimum wage and the obligation to provide additional benefits to employees are binding for Comarch Sistemas LTDA in Brazil and Comarch Technologies Oy in Finland.

In Brazil, the workers' union takes the form of an external structure. At the end of 2020, two employees belonged to this union.

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

S.3.3.

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

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

6.2. Training

S.5.1., S.5.2.

Comarch Training Centre is a section separated from the structures of Comarch S.A. offering specialized training as well as IT and business consultations at every level of advancement, both within internal training addressed to employees of the Comarch Group and offered to a wide range of external clients. The Training Centre uses over 30 years of Comarch experience as a knowledge-based company. On average approx. 10,000 participants a year participate in over 300 training programs conducted by 80 qualified trainers.

The tables below present the average number of training hours per employee (by gender and employment category) in 2019-2020.

Comarch S.A. All trainings	2020			2019		
	managers	others	total	managers	others	total
women	5.39	11.38	10.77	7.13	23.13	21.47
men	5.01	12.78	11.83	6.81	22.82	20.90
Total	5.10	12.39	11.54	6.89	22.90	21.05

Comarch S.A. Internal trainings	2020			2019		
	managers	others	total	managers	others	total
women	5.39	10.33	9.83	7.13	19.55	18.26
men	4.70	11.72	10.85	6.81	20.16	18.56
Total	4.87	11.33	10.58	6.89	19.99	18.48

Comarch Group All trainings	2020			2019		
	managers	others	total	managers	others	total
women	4.53	8.29	8.79	7.38	18.87	19.63
men	4.37	11.56	10.28	8.84	22.38	20.86
Total	4.41	10.50	9.84	8.47	21.93	20.50

Comarch Group Internal trainings	2020			2019		
	managers	others	total	managers	others	total
women	4.53	8.45	8.09	7.38	18.20	17.21
men	4.11	10.16	9.46	6.37	20.11	18.56
Total	4.21	9.64	9.06	6.63	19.54	18.17

Number of employees improving their professional qualifications who are entitled to specific rights in this respect in relation to the employer (e.g. training leaves) with an indication of the number of employees co-financed or financed by the employer to improve their professional qualifications:

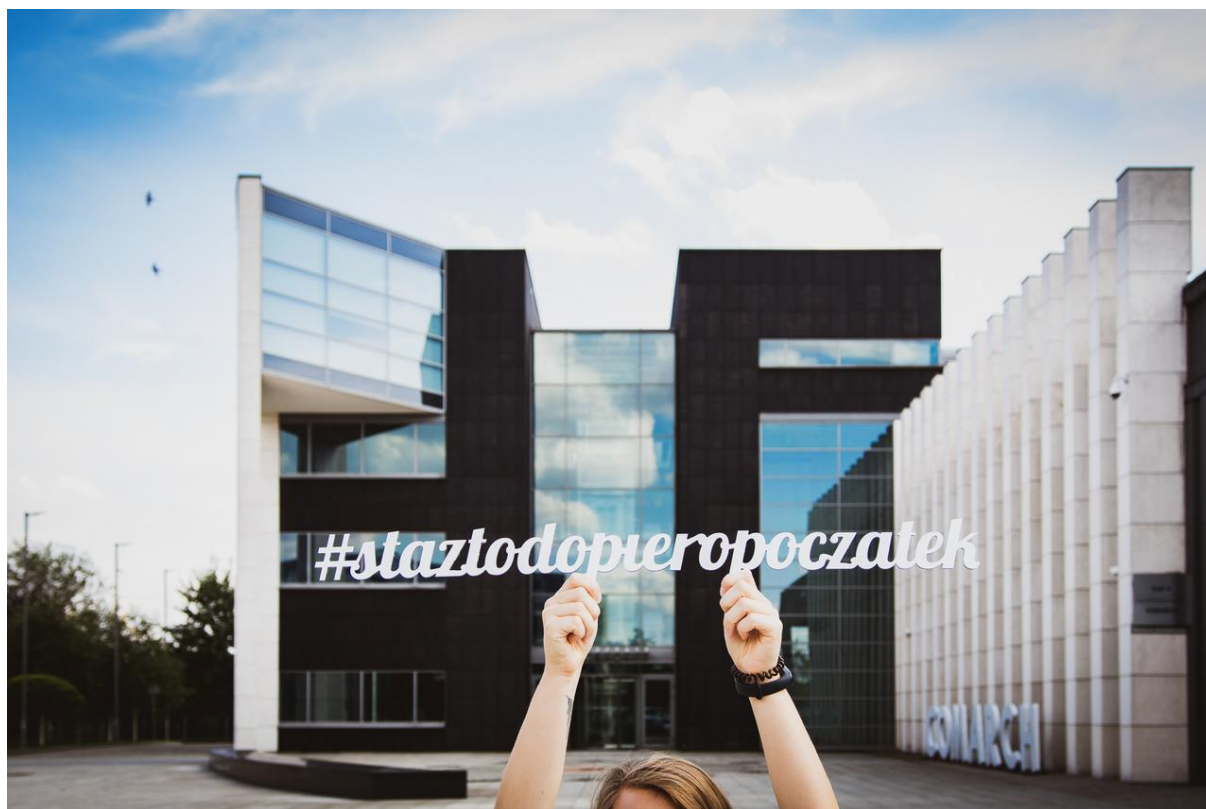
Comarch SA	2020	2019	Comarch Group	2020	2019
All trainings			All trainings		
women	801	1,256	women	968	1,352
men	2,359	3,426	men	2,633	3,570
Total	3,160	4,682	Total	3,601	4,922

Comarch SA	2020	2019	Comarch Group	2020	2019
External trainings			External trainings		
women	32	73	women	32	80
men	87	231	men	93	238
Total	119	304	Total	125	318

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

6.3. Internship Program

The 18th edition of the Comarch internship took place during the summer holidays. It is the largest project of this type in Europe. The internship program is addressed to students of the best technical universities in Poland. Every year, the management board, managers of all levels and administrative departments attach great importance to the organization of the preparation and implementation of the internship program. The involvement of the entire company in accepting interns means that the refined formula of the internship program is developed and enriched with new elements. As a result, the internship program enjoys great interest and an excellent reputation among IT students.



Every year, the interest of students translates into a large number of applications. 4,383 candidates applied for the internship program in 2020 (14 people for one place, in 2019 - 12 candidates for one place, in 2018 - 11).

In the recruitment process, the candidates first faced difficult technical tests. 2,586 candidates were invited to participate in the tests. The attendance at the tests was 90%. The knowledge and competences of students who obtained the best results in the tests were additionally verified during recruitment interviews conducted by managers.

The internship in the UX / UI profile, for which we received 200 applications from candidates (in the previous edition - 97 applications), enjoyed record popularity. Candidates were required to present a portfolio of design work. The creative director, who was personally involved in the recruitment, emphasized the very high level of recruitment. Finally, 10 interns were qualified for an internship in the UX / UI profile.

316 people took part in the 18th edition of Comarch's internship program in 2020. The internship took place in 12 cities in Poland, and students had a choice of 7 profiles: programming, system engineer, Embedded, telecommunications, AI / ML, cybersecurity and UX / UI. For 3 months of paid internship, students worked in teams of several people under the guidance of experienced Comarch employees who acted as supervisors of internship groups. It is the experience, competences, preparation and talent for transferring knowledge by interns that interns particularly appreciated. They emphasized that due to the nature of the work, the opportunity to learn about complex applications and databases, the internship is a unique experience, impossible to repeat in the case of projects organized as part of university classes.

After the internship, 269 interns were employed at Comarch, which accounts for 85% of all interns.

6.4. Occupational Health and Safety (OHS)

System of Supervision and Accident Investigation

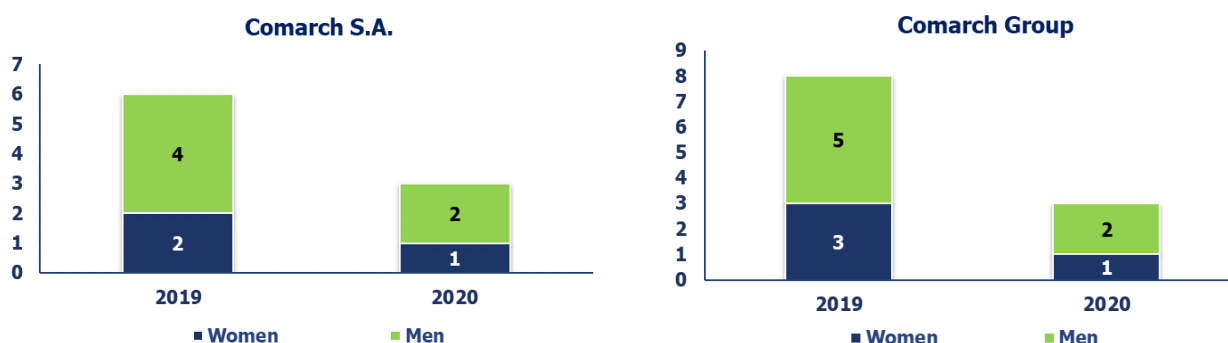
S.4.1., S.4.2., S.4.3., S.4.4., S.4.5., S.4.9

In the Comarch Group, the circumstances and causes of accidents are determined by a two-person post-accident team appointed for this purpose by the Employer, which includes an employee of the OHS Service and an Employee Representative, in accordance with applicable regulations. Protocols determining the circumstances and causes of accidents at work are approved by the Employer. The register of accidents at work and accident documentation are archived. The method of reporting and registering accidents is described in internal procedures developed on the basis of applicable legal requirements and the practice of the Comarch Group.

Accidents at Work

In 2020, 3 accidents at work were recorded in the companies of the Comarch Group; for comparison, in 2019 there were 8 accidents at work. Until 2020, there were no accidents at work among subcontractors of the Comarch Group.

The charts below show the number of accidents at work in Comarch S.A. and in the Comarch Group in 2019 - 2020.



All 3 accidents concerned employees employed under an employment contract in Comarch S.A. Two of them were classified as accidents treated on a par with accidents at work, as they occurred during a business trip, and one as an accident at work.

Summary of Data on Accidents at Work in 2019-2020

In the Comarch Group, for statistical purposes, accident rates are used, which allow the company to be compared and assessed in terms of accident rates. The following measures are used:

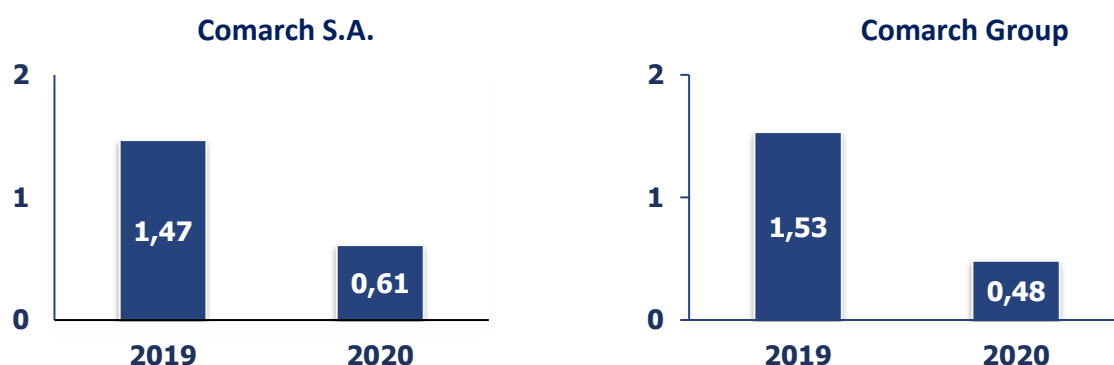
- accident frequency index, expressed as the ratio of the number of accidents to the number of working people (per 1,000 people), and
- accident severity index, expressed as the ratio of the number of days lost due to accident absenteeism to the total number of accidents (this index does not include fatalities victims)

The table below presents the accident rates for the Comarch Group and Comarch S.A. in the years 2019-2020.

Year	Number of accidents at the Comarch Group	Number of accidents broken down by gender of the Comarch Group (W, M)	Number of accidents at Comarch S.A.	Number of days of sick leave at the Comarch Group	Number of sick leave at Comarch S.A.	Comarch Group frequency indicator	Comarch S.A. frequency indicator	Severity rate at the Comarch Group	Severity rate at Comarch S.A.
2019	8	K:3, M:5	6	163	144	1,53	1,47	20,38	24
2020	3	K:1, M:2	3	1	1	0,48	0,61	0,50	0,50

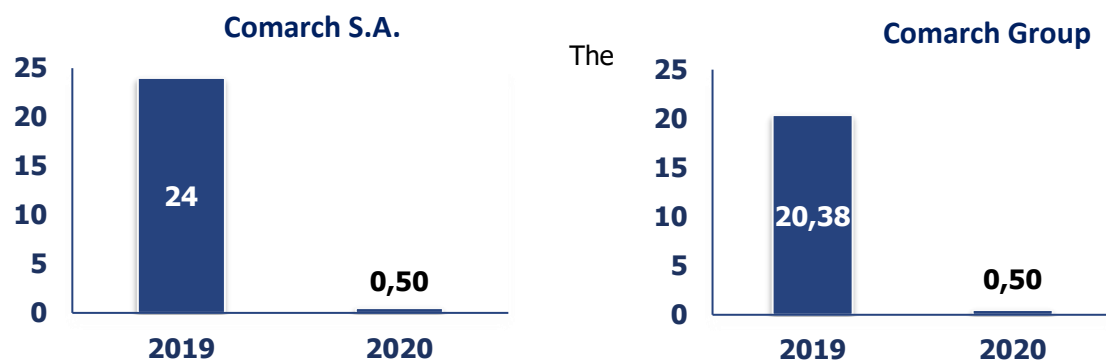
In 2020, the number of accidents at Comarch S.A. decreased by 50% compared to 2019, with a simultaneous increase in employment by 20%. However, for the entire Comarch Group, the number of accidents decreased by 63%, with a simultaneous increase in employment by 1.8%. In 2020, the number of absenteeism days caused by accidents at work significantly decreased from 163 days for the Comarch Group and 144 days for Comarch S.A. up to 1 day, in both cases.

The charts below show the accident frequency rate for Comarch S.A. and the Comarch Group in 2019-2020.



The rate of accidents at work in 2020 at Comarch S.A. was 0.61, while for the entire Comarch Group it was 0.48. Comparing to 2019, a significant decrease of this ratio was recorded (of 59% in the case of Comarch S.A. and of 69% in the case of the Comarch Group).

The charts below show the accident severity rate for Comarch S.A. and the Comarch Group in 2019-2020.



Accident severity rate at work in 2020 was 0.50 for both the Comarch Group and Comarch SA. Comparing to 2019, a significant decrease in this indicator (of approximately 98%) was recorded in both cases.

S.4.6, S.4.7, S.4.8

In Comarch S.A. and companies of the Comarch Group, no cases of occupational diseases have been reported so far.

At Comarch S.A. and companies of the Comarch Capital Group there are no jobs with positions exceeding NDN (maximum allowable intensity) and NDS (maximum allowable concentration). There are also no jobs with an unacceptable level of occupational risk.

Fire Protection and First Aid

The Comarch Group has Rescuers in all its branches, of whom there are 141 in total. Rescuers are employees (volunteers) trained in the principles of first aid and emergency evacuation. Every 2 years, training is organized for Rescuers on first aid and on the rules of conduct in the event of fire and evacuation. The trainings are aimed at preparing new Rescuers for their role, and in the case of other Rescuers - refreshing and systematizing the knowledge and providing information on possible changes in first aid standards, as well as organizational changes in the field of evacuation. During the training, Rescuers have a practical opportunity to become familiar with handheld extinguishing agents. The last training took place in 2019, the next one is planned for 2021.

Rescuers operate on the basis of internal procedures developed and communicated to them.

All employees have access to first aid kits and Fire Safety Instructions, which are updated every 2 years (in accordance with applicable regulations). Trial evacuations are carried out in all locations.

6.5. Activities of the Comarch Group in the Fight Against the Covid-19 Pandemic

Management Board of Comarch S.A. constantly monitors the development of the situation related to the persistent effects of the spread of the SARS-CoV-2 coronavirus and COVID-19 cases. Comarch S.A. implemented all the guidelines recommended by the Chief Sanitary Inspectorate and other state institutions in the countries of the company's operational activity, with particular emphasis on the recommendations regarding the safety, health and hygiene of employees. Business trips to countries identified by the Chief Sanitary Inspectorate as high-risk countries have been suspended, direct contacts between employees within the organization have been limited, a large-scale remote work mode has been launched for office workers, and all hygiene recommendations are applied in Comarch offices. Remote communication methods are widely used in business contacts. Management Board of Comarch S.A. points out that the company's operations are very well diversified in terms of industries, products and geographies, and the effects of the pandemic do not pose a threat to the company's financial stability.

7. Activities for the Benefit of Society**7.1. Activities for the Local Community****S.9.1., S.9.2.**

The operational activity of the Comarch Group does not cause any nuisance to the local community and does not pose a threat to its safety. In 2020, there were no complaints reported by the local community.

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



The Comarch Group engages in various activities aimed at supporting the local community, actively supports environmental protection in its immediate vicinity and works to popularize science. Many initiatives and undertakings are carried out by MKS Cracovia SSA.

Comarch S.A. to Improve the Quality of Organ Music in St. Mary's Church

Comarch S.A. has been cooperating with the St. Mary's Parish for many years. In recent years, the company made a donation for the renovation of the organ in the church and was a co-founder of the new instrument and the entire project of revitalizing the musical space in the church. The medium-sized organs have already been commissioned, and in 2020, work was underway on the construction of new main organs.

Comarch Plays with Last Night of the Proms

For another year in a row, Comarch sponsored the Krakow edition of the Last Night of the Proms event, which was held online due to the prevailing sanitary restrictions. Inside the church St. Katarzyna, we could hear Krzysztof Penderecki's compositions performed by the Beethoven Academy Orchestra and soloists. The concert was organized for the 25th time.

Comarch was also a sponsor of the jubilee of the Boba Jazz Band, which during its 30 years of operation has performed on stages all over the world, including in Germany and the United States.

They Shared what is the Most Valuable - the Blood Donation Campaign

Responding to the needs of the regional blood donation centre, a safe blood donation campaign was organized on the company's campus in Krakow, in which employees participated. 42 people donated a total of 18,800 ml of blood. The action was organized in cooperation with the iMed24 Medical Centre and the Regional Blood Donation and Treatment Centre in Krakow.

An Apartment for a Medic

Employees of the Krakow branch of Comarch S.A. became the organizers of the "Apartment for a medic" campaign. The undertaking was a response to the growing number of cases among medical personnel - doctors, nurses, paramedics, employees of diagnostic stations and other health care workers who care for patients infected with coronavirus on a daily basis.

The Comarch Group has joined the campaign initiated by its employees by providing company apartments, incl. employees from the hospital Żeromski in Krakow.

7.2. Popularization of Science and Education

From the beginning of its activity, the Comarch Group has been actively cooperating with schools, universities and other educational institutions, including: AGH University of Science and Technology, Wrocław University of Technology, Śląsk University of Technology, Jagiellonian University, Łódź University of Technology, and the University of Economics in Kraków.



Last year, Comarch specialists also participated, among others, in a business game implemented by the University of Parma, the Room Room project for French doctors, career days in Poland and Belgium. The companies also supported financially and substantially the organization of UX Poland events - one of the largest conferences for designers in Europe.

In individual departments, employees' initiatives are also created, which involve devoting time to students at dedicated courses or industry meetings and with research clubs.

In addition, in 2020, Comarch was a sponsor of the Interschool IT Festival "Projekt na Szóstkę" ("MFI"). MFI has been organized for 15 years by the Telecommunications School Complex in cooperation with the Mikromakro Institute Foundation and the Krakow Technology Park. Students of technical and high schools from all over Poland participated in the struggle. The festival prepares young people to develop in accordance with their own ideas and to enter the labour market not only as employees, but also as young managers who create jobs for themselves.

In addition, Comarch specialists are eager to share their knowledge by creating many expert articles and creating original podcasts.

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

Cooperation with the Central House of Technology

The Central House of Technology ("CDT") is a modern educational centre in Poland, where you can acquire knowledge in an interactive and interdisciplinary way. CDT is an initiative of the Polish Development Fund, and in 2020 Comarch was the strategic partner of the project.

As part of the cooperation, a field game for the Children's Day was prepared for employees' children. Two versions of the game were prepared - "Lame Pirate Joe" for younger children aged 8-10 and "Robot City" for older children aged 11-13.

Comarch for Education

Comarch popularizes knowledge about ERP systems among economic universities and vocational schools. This activity is carried out through:

- lectures by employees at universities on topics related to IT, technology and economics,
- lending of Comarch ERP systems in educational versions (over 600 educational facilities and institutions equipped with educational versions of Comarch ERP),
- ERP meetings and seminars for lecturers and students, teachers and students of vocational schools,
- training in Comarch ERP systems for pedagogical staff,
- other educational programs and events for students of economic faculties.

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

Comarch Innovation Zone



The Comarch Innovation Zone, operating since 2018, is a space which presents the technological achievements of the Comarch Group in the field of IT systems, telecommunications, the Internet of Things and artificial intelligence. Separate areas of the Zone are dedicated to individual sectors of the economy for which the Comarch Group designs and implements innovative solutions. Visitors have the opportunity to learn about solutions such as Virtual Reality, e-mobility and telemedicine.

The Innovation Zone can be visited not only by business partners. Organized tours, the possibility of communing with modern technologies and expanding knowledge create favourable conditions for school and academic groups. A trip to the Innovation Zone is a great opportunity for young people to have inspiring discussions about the future, choice of studies or career paths. During the tour, students are eager to interact with modern solutions, ask a lot of questions, and deepen their knowledge and interests. The visitors include both high school and primary school students.

A visit to a space full of innovative solutions can be a unique experience, regardless of age. The Comarch Innovation Zone was also visited by the students of the University of the Third Age. The latest solutions turned out to be familiar to them - they were an impulse for a lively discussion about the activities of the Comarch Group and further technological development.

The Comarch Innovation Zone promotes and teaches. A modern, multimedia space encourages interaction with new technologies and facilitates the organization of knowledge. It is a place for meetings and exchange of ideas, and at the same time an exhibition area presenting a vision of the future, extremely attractive and valuable for visitors.

7.3. Sport and Healthy Lifestyle

For over 25 years, the companies of the Comarch Group have been actively involved in promoting sport and an active lifestyle among young people and the inhabitants of the Małopolskie Voivodeship. Since 2003, the company has been the titular sponsor of the oldest, existing football club in Poland, and the five-time Polish Champion - Cracovia, including the hockey section, and until June 2020, it was a sponsor of the premier league football club OSC from Lille, France. The company also promotes an active lifestyle among its employees.

The Comarch Recreation Centre is at the disposal of employees of the Comarch Group companies in Krakow and their families.

Cycling to Work

The Comarch Group encourages employees to come to work by bike in the spring and summer months, providing bicycle infrastructure (e.g. stands, bicycle room, repair stations and changing rooms with showers) and occasional bicycle-related campaigns.

Once again, the company joined the Małopolska campaign "Cycling to work, that is - home, bicycle, work ... and so on and on" organized by the Municipal Economy Department of the Krakow City Hall. In the action aimed at promoting the bicycle as an everyday means of transport, Comarch employees participated from June to the end of October and travelled the distance of 43,199.8 km, adding their

green brick in the fight for a cleaner environment. Regular cycling to work is possible thanks to the infrastructure provided by Comarch. The Polish branches of the company include, among others, lockable bicycle rooms, stands, changing rooms with showers and self-service repair stations.

Cycling campaigns organized in the company are part of the environmental policy, which is part of the company's strategy and management model.

We Run and Help

In 2020, employees from branches in Kraków, Śląsk, Lublin, Poznań, Łódź and Gdańsk participated in the Poland Business Run 2.0 charity run. This year's edition took place on 8th of September in a changed formula, because the competitors ran individually and everyone decided on the route. What remained unchanged is that, although separately, they fought together for a good cause and support for people with physical disabilities.

Charity Sports Competition

Three months of competition, three tasks to be performed, three categories, one common goal - financial support for a selected aid organization. This year's Comarch ONrun / ONbike / ONmove competition was attended by 407 employees who travelled and ran over 117,000 km in total. Thanks to the involvement of employees, it was possible to achieve the goal and financially support the "Słonie na Balkonie" (Elephants on the Balcony) Foundation, which helps children with mental problems. The donated amount allowed to finance over 180 psychological and psychotherapeutic consultations for 100 children aged 4 to 18.

Activity in the Winter Season

At the beginning of 2020, Comarch enabled employees and their families to use free tickets to the ice rink.

7.4. On-Line Activity and Integration

Comarch cares about a good working atmosphere and attaches great importance to employee relations. Despite the inability to organize traditional events, Comarch took initiatives to integrate employees and teams. Many actions were taken directly by the managers of individual teams.

A field Game on the Occasion of Children's Day

In cooperation with the Central House of Technology, a modern educational centre in which Comarch is a strategic partner, an online field game for employees' families was organized. Two versions of the game were prepared - "Lame Pirate Joe" for younger children aged 8-10 and "Robot City" for older children aged 11-13.

CS Tournament: Global Offensive

The competition was organized by the E-sports Company League, integrating the fans of this legendary game. 3 teams from Comarch took part in the nationwide competition.

7.5. Activities Implemented in 2020 by MKS Cracovia SSA

2020 was an extremely difficult time due to the spreading coronavirus pandemic. Comarch, being fully aware of these needs, approached the topic of Corporate Social Responsibility with great care and intensification. However, it should be noted that the emphasis was not only on the fight against the coronavirus itself. The "victims" of the pandemic were also the public mood and local entrepreneurs, therefore there was also a lot to be done on this level. Below are presented the CSR activities

implemented by Comarch through the brand of the Cracovia City Sports Club from the beginning of August to the end of November 2020.

Extra Class Academy

Comarch, in cooperation with MKS Cracovia SSA and Ekstraklasa SA, has once again organized the Extra Talent tournament. The event is aimed at young people aged 11-12. The main goal is to promote physical activity as the best way to spend your free time.

Celebration of Winning the Polish Cup

Bearing in mind the importance of winning the Polish Cup by Cracovia players for a significant part of the society of the City of Krakow, Comarch and the club organized an after-cup event. One of the main ideas behind the organization of the event was the concern to improve the public mood suffered by the lockdown caused by the coronavirus pandemic.

Special Olympics European Football Week

The match of the 5th round of the 2020/21 season of PKO BP Ekstraklasa between Cracovia and Raków Częstochowa was dedicated to the promotion of the European Football Week of Special Olympics. The event, initiated by the organizer of the tournament in cooperation with Comarch, was aimed at drawing attention to the effort that people with intellectual disabilities put into practicing sports. During the match, the announcers read the message of the Special Olympics, and a video promoting athletes with intellectual disabilities appeared on the screens.

Extra Help

Comarch, together with MKS Cracovia SSA, joined the Ekstrapomoc action (Extra help), which consists in promoting mutual fundraising for charity purposes and donating souvenirs for auctions by all teams participating in the Ekstraklasa games. Comarch proposed Matylda Celejewska - a disabled daughter of one of the Cracovia supporters - to the aid project.



Individual Photos with the Polish Cup

Comarch decided to allow Cracovia fans to take individual photos with the Polish Cup. The decision was based on similar values as in organizing the celebration of winning the trophy - the importance of the event for the city's society and the improvement in public mood in connection with the coronavirus pandemic.

Charity Auctions

One of the key areas of Corporate Social Responsibility is care and concern for those in need. For this reason, Comarch donates numerous gadgets to charity organizations collecting funds for helping or treating people in a difficult life situation.

Golden Ribbon Campaign

Comarch was actively involved in the Golden Ribbon campaign, the main goal of which was to raise funds for the treatment of cancerous diseases among children. With the use of Cracovia's social media, fundraising campaigns to fight cancer were promoted. The club's players who counted the kilometres run during the matches, which then translated into the amount of financial support for the campaign by one of its partners, also joined the action.

Movember

November of each year is the month of fighting prostate cancer. Comarch has traditionally joined the Movember campaign aimed at encouraging men to undergo preventive examinations.

It Fits to Help You

Undoubtedly, one of the biggest "victims" of the coronavirus pandemic were local entrepreneurs. Due to the fight against the SARS-CoV-2 virus, decisions on the temporary closure of, among others, restaurants have contributed to great financial losses. For this reason, Comarch offered local service companies free marketing and advertising support using Cracovia's communication channels.

7.6. Donations and Sponsorship

In 2020, due to the situation caused by the ongoing Covid-19 pandemic, the Comarch Group responded to social needs on an ongoing basis by donating 340 electronic equipment (computers and monitors) to schools, orphanages and public benefit organizations needed to organize distance learning, which the value was nearly PLN 78 thousand net.

S.9.4.

The table below shows the total amount of donations for social purposes provided by Comarch S.A. and the Comarch Group in 2019 - 2020.

000' PLN	2020	2019
Comarch S.A.	13	38
<i>the largest recipients</i>	<i>Fundacja Słonie Na Balkonie (Elephants on the Balcony Foundation)</i> <i>Chorągiew Kujawsko - Pomorska ZHP (The Kujawsko-Pomorska Banner of the Polish Scouting Association)</i>	<i>Parafia Rzymsko-Katolicka p.w Wniebowzięcia Najświętszej Maryi Panny (Roman Catholic parish of the Assumption of the Blessed Virgin Mary in Krakow) in Krakow</i> <i>Archdiocese of Krakow</i> <i>Headquarters of the State Fire Service in Krakow</i>
Comarch Group	13	159
<i>the largest recipients</i>	<i>Fundacja Słonie Na Balkonie (Elephants on the Balcony Foundation)</i> <i>Chorągiew Kujawsko - Pomorska ZHP (The Kujawsko-Pomorska Banner of the Polish Scouting Association)</i>	<i>Polish-American Women's Association</i> <i>Virginia Polytechnic Institute and State University</i>

S.9.5.

The table below shows the total amount spent by Comarch S.A. and the Comarch Group in 2019 - 2020.

000' PLN	2020	2019
Comarch S.A.	6,600	6,600
<i>the largest sponsored partners</i>	<i>MKS Cracovia SSA</i>	<i>MKS Cracovia SSA</i>
Comarch Group	6,736	8,246
<i>the largest sponsored partners</i>	<i>MKS Cracovia SSA</i>	<i>MKS Cracovia SSA</i>

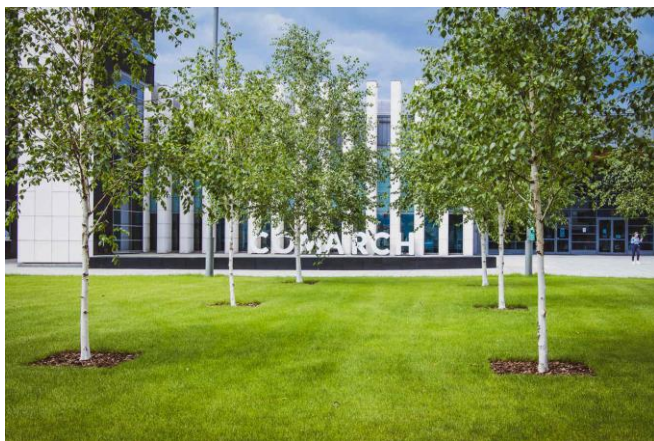
S.9.6.

Regardless of the activities carried out and coordinated by the company, the employees of the Comarch Group are involved in many charity actions (such as volunteering or Szlachetna Paczka (Noble package)).

8. Environmental Protection

8.1. Environmental Management System and Energy Management System

Integrated Management System Policy and procedures within the implemented systems oblige Comarch Group to take active measures to reduce the negative impact on the natural environment. As part of the implemented Environmental Management System in accordance with the requirements of ISO 14001, Comarch has identified environmental aspects that it monitors, supervises and influences.



All the Companies of the Comarch Group comply with local legal provisions regarding environmental protection. Comarch consciously limits the negative impact of its activities on the natural environment, minimizes the consumption of natural resources and limits the production of waste arising from ongoing operations. It also promotes an ecological lifestyle among its employees, running campaigns to encourage active participation in environmental protection.

In Comarch S.A. the Energy Management System has been implemented and certified in accordance with the international standard ISO 50001. Under this system, a number of actions are taken to improve the company's energy efficiency, mainly in the areas of so-called significant energy consumption (electricity, heat, fleet). These activities include the modernization of buildings and equipment, the use of renewable energy sources, the use of appropriate purchasing policy, fleet modernization policy, as well as conducting awareness campaigns among employees and continuous monitoring of relevant indicators. The listed activities are implemented as part of energy programs and tasks for a given period.

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

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

The Comarch Group constantly monitors air pollution with a sensor installed on one of its buildings located in the Special Economic Zone in Krakow. The sensor is included in the Airly sensor network which helps to create a national measurement network monitoring smog.

8.2. The Use of Natural Resources

E.1.1., E.1.2.

Due to the fact that the Comarch Group is a producer of software and information systems, the company's activity is not related to the direct use of natural resources such as ores, minerals, wood. Instead, it uses typical media that is consumed during the day's work. Among the raw materials used, the following were identified: electricity, natural gas, liquid fuels (gasoline and diesel), heat energy and water.

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

Other Comarch Group companies also do not directly use primary raw materials.

In addition, paper, cardboard, plastic and wooden packaging and security are used in the production and logistics processes. Below there is a summary of the quantities of packaging placed on the market. The number of introduced packaging results directly from the sales volume.

The following table shows the number of kilograms of packaging launched on the market by Comarch S.A. and the Comarch Group in 2019 - 2020.

Packaging launched on the market	2020	2019
Comarch S.A.	545 kg	889 kg
Comarch Group	1,075 kg	2,391 kg

8.3. Reduction of Energy Consumption

Energy Consumption of Products

Electronic devices manufactured by the Comarch Group are powered by electricity, which affects the environment. The amount of energy consumed by products is not possible to accurately estimate, because it depends on many factors, including on the intensity of use, weather conditions, operating mode and the type of accessories attached to the devices.

The Comarch Group sets itself one of the main goals to reduce electricity consumption in each subsequent version of a given device. This is done by optimizing power consumption in both the Firmware and Hardware areas. Examples include using energy-efficient technologies, such as NB IoT, or using components that use less energy.

The Comarch Group also provides solutions which support water, electricity and gas suppliers in monitoring transmission networks. This allows for reduced utility losses, quick fault detection, and consequently less consumption of the earth's natural resources. The table below shows the percentage of revenue from finished goods and related services developed with environmental criteria in Comarch S.A. and the Comarch Group in 2019 - 2020.

E.8.2
Revenue from products and related services developed taking into account environmental criteria

	2020	2019
Comarch S.A.	1.8%	3.8%
Comarch Group	2.4%	3.2%

Electricity, Heat, Gas and Fuel Consumption

E.2.1., E.2.2., E.2.3.

The Comarch Group constantly monitors the consumption of electricity, heat and fuels in all areas of its activity, focusing primarily on the consumption of electricity and gas used in buildings owned by Comarch S.A. and on the consumption of liquid fuels used to propel cars belonging to the Comarch fleet. Additionally, the consumption of water as well as liquid fuels used in power generators is monitored. The Data Centre in Krakow, Warsaw, as well as in Dresden in Germany and in Lezennes in France have a significant share in the consumption of electricity.

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

In the Comarch approach, is also taken into account consumption for buildings belonging to Comarch Group companies in Dresden, Germany, Lezennes in France, iMED Medical Centre in Krakow and for a building in Łódź at Jaracza 78 St. In 2020, the OPSO canteen, which is currently managed by an external entity, was excluded from the summary.

The following tables present the consumption of electricity, heat, gas and other energy carriers, water and CO₂ emissions at Comarch S.A. and in the Comarch Group in 2019 - 2020.

Comarch S.A.'s Consumption of electricity, heat, gas and fuels¹⁾	2020	2019
Consumption of energy ²⁾	17,364,894 kWh	17,594,566 kWh
Consumption of heat ³⁾	4,037,720 MJ	4,248,000 MJ
Consumption of gas ⁴⁾	465,673 m ³	451,749 m ³
Consumption of gasoline ⁵⁾	250,681 kg	380,610 kg
Consumption of diesel fuel ⁵⁾	28,026 kg	52,366 kg
Consumption of LPG ⁵⁾	519 kg	652 kg
Total consumption of energy ⁶⁾	97,966,207 MJ	105,937,478 MJ
Consumption of energy/employee ⁶⁾	19,570 MJ/employee	21,277 MJ/employee

- 1) Electricity consumption is presented for buildings located in Poland owned by Comarch S.A. i.e. buildings in the Special Economic Zone (SSE2, SSE3, SSE4, SSE5, SSE6, SSE7) and two buildings in Warsaw (at Puławska St. and at Leśna St.).
- 2) Electricity consumption is presented for buildings located in Poland owned by Comarch S.A. i.e. buildings in the Special Economic Zone (SSE2, SSE3, SSE4, SSE5, SSE6, SSE7) and two buildings in Warsaw (at Puławska St. and at Leśna St.). The total electricity consumption for these buildings is shown. Electricity consumption in 2020 increased by approx. 1.3% compared to 2019. Server rooms have a significant share in electricity consumption, therefore the situation related to Covid-19 did not significantly reduce consumption.
- 3) Heat consumption is presented for buildings SSE5, SSE6, SSE7. The total heat consumption for these buildings is shown converted to MJ. Heat consumption in 2020 fell by approx. 5.0% compared to 2019.
- 4) Gas consumption is presented for buildings located in Poland owned by Comarch S.A., i.e. buildings in the Special Economic Zone (SSE2, SSE3, SSE4) and buildings in Warsaw (at Puławska St. and at Leśna St.). The total gas consumption for these buildings is presented in cubic meters. Gas consumption increased by approximately 3.1% compared to 2019.
- 5) The consumption of gasoline, diesel and LPG is presented for:
 - gasoline: the total gasoline consumption for the car fleet in Poland and the fuel used in low-speed equipment is presented.
 - diesel oil: the total consumption of diesel oil for the car fleet in Poland and oil used in machines and aggregates used for emergency power supply is presented.
 - LPG: consumption of LPG propane-butane LPG for the car fleet in Poland is presented.

Fuel consumption is given in kg, using the following factors for the calculation: 1 liter of gasoline = 0.755 kg, 1 liter of diesel oil = 0.84 kg, 1 liter of LPG is 0.5 kg. Gasoline consumption in 2020 decreased by approx. 34.1% compared to 2019. This large decrease may be due to movement restrictions associated with the Covid-19 pandemic. At the same time, the consumption of diesel oil in 2020 compared to 2019 decreased by about 46.5%. There is also a noticeable decrease in LPG consumption compared to 2019 by 20.4%.

- 6) For the calculation of the total energy consumption within the organization, the consumption of electricity, heat, gas and fuels (gasoline, diesel and LPG) presented above was taken into account. The following factors were used in the calculations: 1 kg of gasoline = 12.836 kWh, 1 kg of diesel oil = 12.589 kWh, 1 kg of LPG = 13.702 kWh, developed by DEFRA, while for gas the invoice factors have been used. Total energy consumption has been converted to MJ. Total energy consumption in 2020 was 97,966,207 MJ and decreased by approx. 7.5% compared to 2019. The intensity of energy consumption was also calculated taking into account the number of employees in buildings owned by Comarch S.A. According to data as at 31st of December, 2020 at Comarch S.A. 5,006 employees were employed, which represents an increase in employment of 27 people compared to the same period of 2019. Energy consumption per person in 2020 was 19,570 MJ, so it decreased by approx. 8.0% compared to 2019.

Consumption of electricity, heat, gas and fuels in the Comarch Group ⁷⁾	2020	2019
Consumption of energy ⁸⁾	21,766,435 kWh	22,309,884 kWh
Consumption of heat ⁹⁾	6,769,681 MJ	7,188,247 MJ
Consumption of gas ¹⁰⁾	465,673 m ³	459,156 m ³
Consumption of gasoline ¹¹⁾	303,504 kg	445,159 kg
Consumption of diesel oil ¹¹⁾	61,239 kg	120,462 kg
Consumption of LPG ¹¹⁾	519 kg	652 kg
Total consumption of energy ¹²⁾	120,489,868 MJ	132,302,879 MJ
Consumption of energy/employee ¹²⁾	18,646 MJ/ employee	19,710 MJ/ employee

- 7) The total data for buildings owned by both Comarch S.A. and companies of the Comarch Group (domestic and foreign) is presented. For Comarch S.A. these are buildings in the Special Economic Zone (SSE2, SSE3, SSE4, SSE5, SSE6, SSE7) and two buildings in Warsaw (at Puławska St. and at Leśna St.), excluding the building SSE1, whose area is rented by external entities. According to the Comarch Group, these are also buildings in Dresden in Germany, Lezennes in France, the iMED Medical Centre in Kraków and a building in Łódź at Jaracza 78 St. In 2020, the OPSO canteen, which is currently managed by an external entity, was excluded from the summary.
- 8) Electricity consumption is presented for buildings owned by Comarch Group companies (domestic and foreign). In 2020, electricity consumption was lower by approx. 2.4% compared to 2019.
- 9) Heat consumption in the own buildings of Comarch Group companies in 2020 decreased by approx. 5.8% compared to the base year (2019). Consumption is presented for buildings of Comarch S.A. (SSE5, SSE6 and SSE7) and for the buildings of the Comarch Group companies (Dresden in Germany, iMED Medical Centre in Krakow, Łódź at Jaracza 78 St.).
- 10) Gas consumption is presented for Comarch S.A.'s own buildings (buildings in the Special Economic Zone SSE2, SSE3, SSE4) and buildings in Warsaw at Puławska St. and at Leśna St.), the remaining buildings do not have gas. In 2020, gas consumption for the OPSO canteen, managed by an external entity, was excluded from the summary. Consumption increased by approx. 1.4% compared to 2019.
- 11) The consumption of gasoline, diesel and LPG is presented for:
- gasoline: total gasoline consumption for Polish and foreign companies is presented,
 - diesel oil: total diesel oil consumption for Polish and foreign companies is presented,
 - LPG: consumption for Comarch S.A. is presented.

Fuel consumption for the Comarch Group takes into account the consumption of the car fleet, low-speed equipment, machines and aggregates used for emergency power supply.

There was a decrease of gasoline and diesel consumption in 2020 compared to 2019 due to reduced mobility caused by the Covid-19 pandemic. In the case of gasoline, consumption decreased by 31.8% compared to the base year (2019), while diesel consumption decreased by 49.2%. The decrease in LPG consumption compared to 2019 is 20.4%.

- 12) Total energy consumption in 2020 was 120,489,868 MJ and was 8.9% lower than consumption in 2019. The intensity of energy consumption was also calculated taking into account the number of employees in Comarch Group companies. According to data as at 31st of December, 2020, the Comarch Group companies employed 6,462 employees, which is an increase in employment of 114 people compared to the same period of 2019.

Responsible management of the car fleet is also conducive to reducing energy consumption.

In 2020, the replacement of the fleet in the companies of the Comarch Group, due to complications related to the Covid-19 pandemic, was characterized by lower dynamics than in previous years. Purchases of new vehicles have been limited. Only 12 new cars meeting the EURO 6 standard were purchased in Polish companies of the Comarch Group (4 in Comarch S.A.), while 13 vehicles (9 in Comarch S.A.) characterized by EURO 4 and EURO 5 standards have been decommissioned, nevertheless, the percentage of cars that meet the most stringent EURO 6 standard is getting higher with each subsequent year.

The following tables present the percentage of cars in Comarch S.A. and in the Comarch Group that meet the individual exhaust emission standards in 2019 - 2020.

Car exhaust emission standards at Comarch S.A.	2020	2019
EURO 6	79%	73%
EURO 5	20%	26%
EURO 4 and lower	1%	1%

In other subsidiaries of the Comarch Group, most cars also meet the EURO 6 emission standard, and despite limited purchases in 2020, their number has increased compared to less environmentally friendly vehicles (EURO 4 and EURO 5 standards). As in Comarch S.A. it can be observed that more vehicles were decommissioned from use than new ones were purchased.

Car exhaust emission standards at the Comarch Group	2020	2019
EURO 6	85%	75%
EURO 5	14%	23%
EURO 4 and lower	1%	2%

8.4. Water Consumption and Discharged Sewage

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

Activities of the Comarch Group do not involve the use of water for technological purposes. Water supplied entirely by municipal waterworks is used only in hygienic and sanitary rooms for living purposes. The Comarch Group does not collect surface water directly and does not discharge sewage into water and land.

The recreation centre, which includes a 25-meter swimming pool, has a significant impact on the level of water consumption in the Krakow SEZ.

Water consumption is constantly monitored in the form of readings from sub-meters. As part of efforts to minimize consumption, employee awareness is raised and actions are taken to increase the speed and effectiveness of responding to various types of failures.

The following tables present water consumption in Comarch S.A. and in the Comarch Group in 2019 - 2020.

Water consumption in Comarch S.A.	2020	2019
Water consumption	24,655 m ³	37,591 m ³
Water consumption per 1 employee	4.93 m ³	7.55 m ³
Water consumption in the Comarch Group	2020	2019
Water consumption	30,483 m ³	45,532 m ³
Water consumption per 1 employee	4.72 m ³	7.17 m ³

Water consumption is presented for buildings owned by Comarch in Poland, i.e. buildings in the Special Economic Zone (SSE2 - SSE7), and also two buildings in Warsaw (at Puławska St. and at Leśna St.).

In addition, the table on water consumption in the Comarch Group presents the total water consumption taking into account buildings owned by Comarch S.A. and other Group companies in Poland and abroad. In 2020, there was a decrease in water consumption for Comarch S.A.'s own buildings, which is mainly due to the introduction of remote work in connection with Covid-19.

E.6.5

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

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

8.5. Greenhouse Gas Emissions

The Amount of Greenhouse Gas Emissions

E.5.1., E.5.3.

The Comarch Group constantly strives to minimize the negative impact of operations on the environment. Therefore, from 2012 the emission of carbon dioxide equivalent to the environment is estimated. During the estimation, a methodology was used to multiply data on energy, water and fuel consumption by appropriate emission conversion factors. These conversion factors allow the conversion of these data into carbon dioxide equivalent (CO₂e). CO₂e is a universal unit of measure that allows estimating the impact on global warming resulting from greenhouse gas emissions. Below are estimates of direct (resulting from the organization's activities) and indirect (from all other activities, e.g. electricity, water consumption) carbon dioxide emissions for the base year.

The following tables present direct greenhouse gas emissions in Comarch S.A. and in the Comarch Group in 2019 - 2020.

Direct greenhouse gas emissions in Comarch S.A.	2020	2019
Emission CO ₂ e	1,853 Mg CO ₂ e	2,738 Mg CO ₂ e
Emission CO ₂ e/person	0.37 Mg CO ₂ e / person	0.55 Mg CO ₂ e / person
Emission CO ₂ e/ income unit*	0.0019 Mg CO ₂ e	0.0029 Mg CO ₂ e
Direct greenhouse gas emissions in the Comarch Group	2020	2019
Emission CO ₂ e	2,106 Mg CO ₂ e	3,152 Mg CO ₂ e
Emission CO ₂ e/person	0.33 Mg CO ₂ e / person	0.50 Mg CO ₂ e / person
Emission CO ₂ e/ income unit*	0.0014 Mg CO ₂ e	0.0022 Mg CO ₂ e

*) PLN 1,000

For the calculation of direct greenhouse gas emissions, data on fuel consumption (gasoline, diesel and LPG), as well as natural gas for buildings owned by Comarch S.A. in Poland were used. Fugitive HFC hydrofluorocarbons emissions from leaks in refrigeration and air conditioning systems have also been taken into account. The calculations used indicators developed by the DEFRA organization - Greenhouse Gas Conversion Factor Repository and KOBIZE. In addition, data from the analysis of the Central Operator's database was used to calculate HFC emissions. Direct Greenhouse Gas Emission for Comarch S.A. in 2020 amounted to 1,853 Mg of CO₂e, which is a decrease of approx. 32.3% compared to 2019. The decrease in direct emissions was influenced, among others, by reduction of fuel consumption. Gas consumption remained stable and in 2020 it was only about 3.1% higher than in 2019. In 2020, there were fewer incidents related to leaks in refrigeration and air-conditioning equipment than in 2019. These incidents were properly recorded in the "Reports for places of environmental use" in the National Base on Greenhouse Gas Emissions and Other Substances as random emissions. In addition, appropriate fees for using the environment have been paid to the local Marshal Offices. Direct CO₂e emissions per employee for Comarch S.A. decreased by 32.7% compared to 2019 and CO₂e emissions per unit of revenue decreased by 34.5%.

The following tables present the total greenhouse gas emissions in Comarch S.A. and in the Comarch Group in 2019 - 2020.

Total greenhouse gas emissions at Comarch S.A. (direct and indirect combined)		
	2020	2019
Emission CO ₂ e	14,735 Mg CO ₂ e	16,211 Mg CO ₂ e
Emission CO ₂ e/person	2.94 Mg CO ₂ e/ person	3.26 Mg CO ₂ e/ person
Total greenhouse gas emissions at Comarch Group (direct and indirect combined)		
	2020	2019
Emission CO ₂ e	16,676 Mg CO ₂ e	18,752 Mg CO ₂ e
Emission CO ₂ e/person	2.58 Mg CO ₂ e/ person	2.95 Mg CO ₂ e/ person

To calculate the intensity of greenhouse gas emissions, the organisation's direct and indirect greenhouse gas emissions were added up. The emissions related to the consumption of electricity and the emissions related to the transport of water were taken into account as indirect emissions. For the calculation of emissions from electricity in 2020, conversion factors from KOBIZE (National Centre for Emission Balancing and Management), RTE France (Réseau de Transport d'Electricité) and UBA (Umweltbundesamt) were used. Conversions were used to calculate the emission related to the transport of water from Defra - Greenhouse Gas Conversion Factor Repository. The data related to indirect emissions from electricity for 2019 was recalculated using national indicators from the above-mentioned sources, which made it possible to compare the total emissions in 2019 and 2020, therefore the baseline data for 2019 changed. Total greenhouse gas emissions for Comarch S.A. in 2020 amounted to 14,735 MgCO₂e, which is a decrease by approx. 9.1% compared to 2019. The intensity of greenhouse gas emissions was also calculated, taking into account the number of employees at Comarch S.A. According to the data as of 31st of December, 2020, 5,006 people were employed, which is an increase in employment by 27 people compared to the corresponding period of 2019. The total greenhouse gas emissions per person in 2020 amounted to 2.94 Mg CO₂e, so it decreased by approximately 9.8% compared to 2019.

The Comarch Group, taking care of both the environment and the reduction of costs related to transport, shortens the supply chain to the maximum by applying the principle of delivery directly from the distribution point to the end user or business partner, wherever possible, i.e. where no intervention is required to configure, install on the equipment or such interference would still occur at the end user's location.

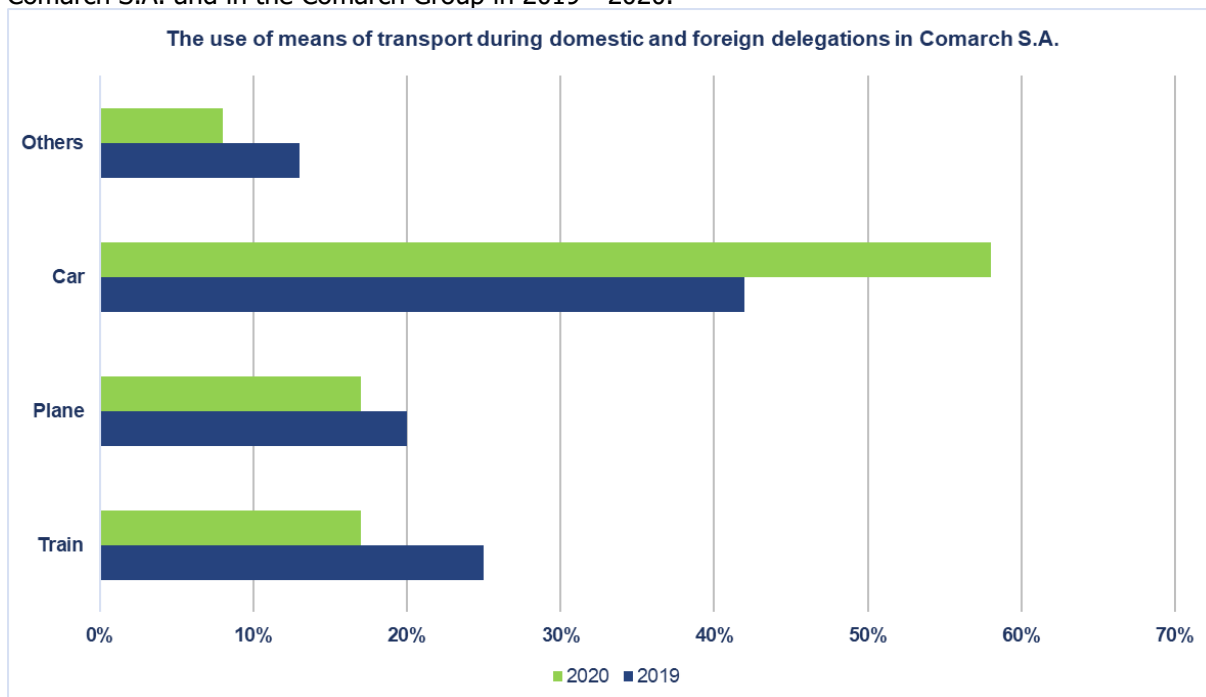
A large reduction in the impact of transporting goods and products is also possible thanks to the use of public transport - courier companies.

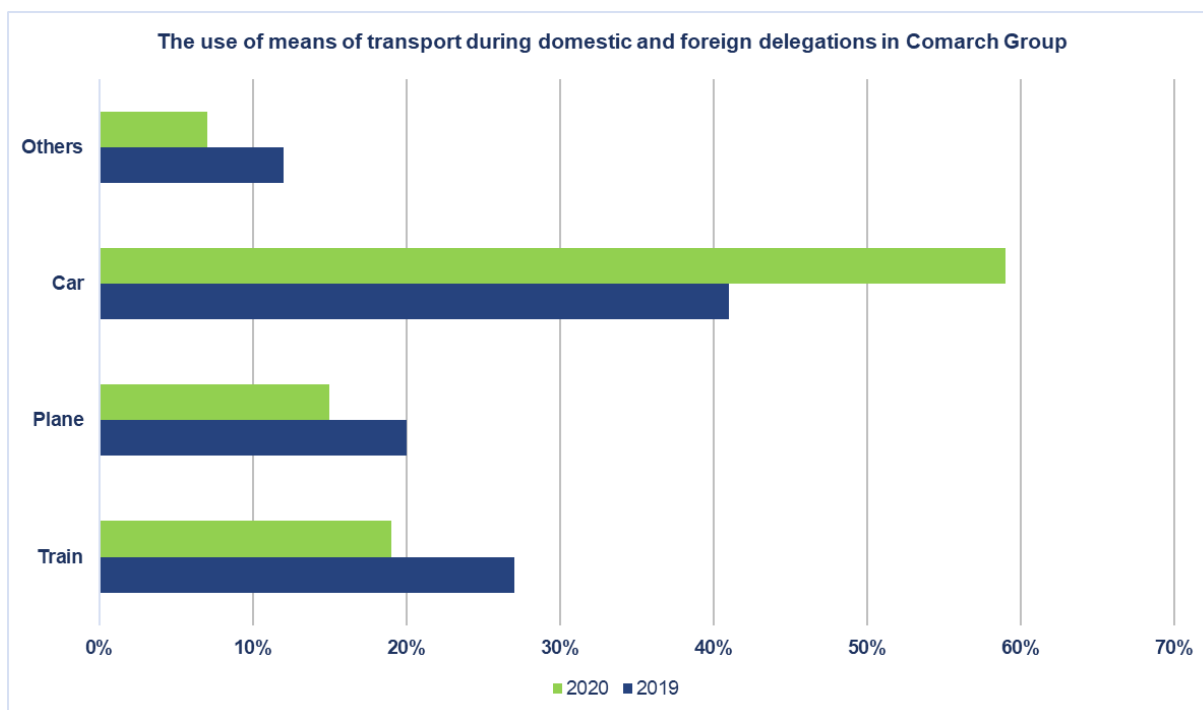
Transports organized and carried out by means of own means of transport by employees of Comarch S.A. are sporadic.

Because Comarch has a very large group of recipients, which are medium and large enterprises from around the world, the number of business trips carried out by Comarch employees is counted in thousands.

In 2020, due to the ongoing Covid-19 pandemic, the total number of delegations for the entire Comarch Group decreased by approx. 74%. The largest decrease could be observed in the second quarter, when the number of delegations was lower by as much as 92% compared to the same period of 2019. The car was still the most popular means of transport, but its use increased by approx. 20% compared to the previous year (an increase from approx. 40% to approx. 60%). Due to the epidemiological threat, the use of public transport in 2020 was limited.

The charts below show the use of means of transport during domestic and foreign delegations in Comarch S.A. and in the Comarch Group in 2019 - 2020.





Reduction of Greenhouse Gas Emissions

Actions related to the reduction of direct greenhouse gas emissions carried out in 2020:

- Systematic maintenance and modernization of installations containing hydrofluorocarbons (HFCs),
- Production of renewable energy in our own photovoltaic installation has allowed to reduce CO₂ emissions by 28.09 Mg,
- Ongoing implementation of energy-saving solutions (replacement of light sources with LED lighting),
- Gradual replacement of combustion vehicles with ones that meet the latest emission standards.

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

ODS and F-gas emissions are monitored in Poland using the CRO database (Central Register of Operators). It records all air conditioning and firefighting equipment containing ozone depleting gases. Information on inspections and possible supplements of gases is entered in the register. In 2020, there were no ODS emissions, but there were emissions of hydrofluorocarbons (HFCs) from leaks in cooling installations and air-conditioning.

The table below presents ODS and F-gas emissions in the Comarch Group in 2019 - 2020.

ODS and F-gas emissions	2020	2019
The Comarch Group	55 kg	260 kg

The data in the table above show emissions monitored on the basis of the CRO database for buildings owned by the Comarch Group, located in Poland. In 2020, installations were supplemented with 78.8% less F-gases compared to 2019. All leaks in 2020 related to installations in Comarch S.A.'s own buildings.

E.5.2., E.5.4.

The tables below present the emissions of nitrogen oxides, sulphur oxides and other significant air emissions at Comarch S.A. and in the Comarch Group in 2019 - 2020.

Comarch S.A.	2020	2019
Emission CH ₄	2.231 Mg CH ₄	3.488 Mg CH ₄
Emission of CH ₄ /unit of income*	2.23*10 ⁻⁶ Mg CH ₄	3.66*10 ⁻⁶ Mg CH ₄
Emission of N ₂ O	3.129 Mg N ₂ O	5.281 Mg N ₂ O
Emission of N ₂ O/unit of income*	3.13*10 ⁻⁶ Mg N ₂ O	5.55*10 ⁻⁶ Mg N ₂ O
Emission of SO _x /SO ₂	0.037 Mg SO _x /SO ₂	0.036 Mg SO _x /SO ₂
Emission of SO _x /SO ₂ /unit of income*	3.73*10 ⁻⁸ Mg SO _x /SO ₂	3.80*10 ⁻⁸ Mg SO _x /SO ₂
Emission of NO _x /NO ₂	0.799 Mg NO _x /NO ₂	0.771 Mg NO _x /NO ₂
Emission of NO _x /NO ₂ /unit of income*	7.99*10 ⁻⁷ Mg NO _x /NO ₂	8.10*10 ⁻⁷ Mg NO _x /NO ₂
Emission of CO	0.118 Mg CO	0.115 Mg CO
Emission of CO/unit of income*	1.18*10 ⁻⁷ Mg CO	1.21*10 ⁻⁷ Mg CO
Emission of total suspended particles TSP	0.0015 Mg TSP	0.0015 Mg TSP
Emission of total suspended particles TSP /unit of income*	1.51*10 ⁻⁹ Mg TSP	1.58*10 ⁻⁹ Mg TSP

Comarch Group	2020	2019
Emission of CH ₄	2.708 Mg CH ₄	4.101 Mg CH ₄
Emission of CH ₄ /unit of income*	1.76*10 ⁻⁶ Mg CH ₄	2.85*10 ⁻⁶ Mg CH ₄
Emission of N ₂ O	4.933 Mg N ₂ O	8.579 Mg N ₂ O
Emission of N ₂ O/unit of income*	3.21*10 ⁻⁶ Mg N ₂ O	5.97*10 ⁻⁶ Mg N ₂ O
Emission of SO _x /SO ₂	0.037 Mg SO _x /SO ₂	0.037 Mg SO _x /SO ₂
Emission of SO _x /SO ₂ /unit of income*	2.43*10 ⁻⁸ Mg SO _x /SO ₂	2.56*10 ⁻⁸ Mg SO _x /SO ₂
Emission of NO _x /NO ₂	0.799 Mg NO _x /NO ₂	0.784 Mg NO _x /NO ₂
Emission of NO _x /NO ₂ /unit of income*	5.20*10 ⁻⁷ Mg NO _x /NO ₂	5.45*10 ⁻⁷ Mg NO _x /NO ₂
Emission of CO	0.118 Mg CO	0.117 Mg CO
Emission of CO/unit of income*	7.67*10 ⁻⁸ Mg CO	8.15*10 ⁻⁸ Mg CO
Emission of total suspended particles TSP	0.0016 Mg TSP	0.0015 Mg TSP

Emission of total suspended particles TSP/unit of income*	1.05*10 ⁻⁹ Mg TSP	1.05*10 ⁻⁹ Mg TSP
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*PLN 1,000

Significant air pollutants generated by organizations considered are CH₄ and N₂O from fuel combustion by the car fleet and low-speed equipment, as well as SO_x/SO₂, NO_x/NO₂, CO, total dust from natural gas combustion in own installations and fuels by machines and aggregates used for emergency power supply. The calculations were based on the indicators developed by the DEFRA organization - Greenhouse Gas Conversion Factor Repository and the National Centre for Emissions Management (KOBIZE) for 2020. The data related to CH₄ and N₂O emissions were calculated using DEFRA indicators, while other emissions were calculated using KOBIZE indicators. The data given in the table are estimates.

For Comarch S.A. CH₄ emissions in 2020 amounted to 2.231 Mg of CH₄, which is a decrease compared to 2019 of approx. 36.0%. N₂O emissions in 2020 amounted to 3.129 Mg of N₂O, which is a decrease compared to 2019 of approx. 40.7%. The emission of SO_x/SO₂ in 2020 amounted to 0.037 Mg of SO_x/SO₂, which is an increase compared to 2019 of approx. 2.8%. NO_x/NO₂ emissions in 2020 amounted to 0.799 Mg of NO_x/NO₂, which is an increase compared to 2019 of approx. 3.6%. CO emission in 2020 amounted to 0.118 Mg of CO, which is an increase compared to 2019 of approximately 0.9%. The emission of total suspended particulate TSP in 2020 and 2019 was approximately 0.0015 Mg.

For the Comarch Group, CH₄ emissions in 2020 amounted to 2.708 Mg of CH₄, which is a decrease compared to 2019 of approx. 34.0%. N₂O emissions in 2020 amounted to 4.933 Mg of N₂O, which is a decrease compared to 2019 of approx. 42.5%. The SO_x/SO₂ emissions in 2020 and 2019 were approximately 0.037 Mg of SO_x/SO₂. NO_x/NO₂ emissions in 2020 amounted to 0.799 Mg of NO_x/NO₂, which is an increase compared to 2019 of approx. 1.9%. CO emission in 2020 amounted to 0.118 Mg CO, which is an increase compared to 2019 of approximately 0.9%. The total emission of suspended particulate TSP in 2020 amounted to 0.0016 Mg, which is an increase of approx. 6.7%.

Local climatic conditions may affect the decrease or increase in emissions. The decrease in the ratios was also affected by the increase in revenue during the period considered. Air emissions were appropriately recorded in the "Reports for places of use of the environment" and in the "Reports on the operation of the equipment" in the National Base on Greenhouse Gas and Other Substances Emissions - KOBIZE. In addition, fees were paid for the introduction of gases and dust into the air in accordance with the applicable legal regulations.

8.6. Waste

E.6.5

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

Products manufactured by the Comarch Group do not have a significant negative impact on the natural environment during use. The degree of environmental impact of introduced electronic products at the end of their life cycle depends mainly on the behaviour of customers in this regard. The Comarch Group collects used electronic and electrical equipment. More information at: <https://www.comarch.pl/o-firmie/srodowisko/wprowadzanie-oraz-zbieranie-sprzetu-elektrycznego-i-elektronicznego/> (ENG: [Corporate Social Responsibility | COMARCH SA](#))

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

The Comarch Group has implemented waste management procedures. Waste is collected selectively and prevents its negative impact on the natural environment. In the field of waste transport and disposal, the Comarch Group cooperates only with authorized entities that have technical means and administrative decisions that allow for the management of the transferred waste in a manner that is safe for people and the environment.

The table below shows the amount of waste generated and transferred by the Comarch Group companies in 2019 - 2020. Waste electronics constitute the largest percentage of the waste stream generated by the Comarch Group - resulting from the modernization of IT equipment. This waste, in accordance with Polish legislation, undergoes the process of recycling and recovery in waste treatment installations of companies collecting waste.

Comarch Healthcare S.A. is a producer of medical waste resulting from the conducted activity. These wastes are transported and neutralized by authorized entities.

Hazardous wastes are marked in the table with the symbol "*", masses are given in megagrams.

Significant types of waste are marked in bold, the weight of the remaining waste is given jointly for the group companies. All companies of the Comarch Group annually report the amount of generated waste to the local Marshal's Offices.

Type of waste	Code of waste	The amount of waste generated and transferred in 2020 (locations in Poland)	The amount of waste generated and transferred in 2019 (locations in Poland)
Packaging containing residues of or contaminated by hazardous substances	15 01 10*	Mg --	Mg 0.026
Waste equipment containing freons, HCFCs, HFCs	16 02 11*	Mg --	Mg 0.015
Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12	16 02 13*	Mg 0.325	Mg 0.795
Discarded appliances other than those mentioned in 16 02 09 to 16 02 13 - electronic scrap	16 02 14	Mg 7.989	Mg 11.313
Batteries and lead accumulators	16 06 01*	Mg 3.372	Mg --
Other batteries and accumulators	16 06 05	Mg 0.045	Mg --
Medical waste (Comarch Healthcare S.A.)	18 01 03*	Mg 4.492	Mg 3.861
Medicines other than those mentioned in 18 01 08 (Comarch Healthcare S.A.)	18 01 09	Mg 0.046	Mg 0.016

**hazardous waste*

Recovery and Recycling

The companies of the Comarch Group do not collect, recover and recycle waste electrical and electronic equipment, batteries and accumulators as well as packaging on their own.

In 2020, the obligation to collect, recover and recycle waste electrical and electronic equipment for Comarch S.A., Comarch Healthcare S.A., Comarch Polska S.A., Comarch Technologies Sp. z o.o. and CA Consulting S.A. was implemented by Biosystem Elektrorecykling S.A.

However, the obligation to collect, recover and recycle batteries and accumulators for Comarch Healthcare S.A., Comarch S.A. and Comarch Technologies Sp. z o.o. and the obligation to collect, recover and recycle packaging for Comarch S.A. in 2020 it was carried out by Biosystem Organizacja Odzysku Opakowań S.A.

The companies that did not have signed relevant agreements with recovery organizations for the implementation of obligations resulting from the introduction of batteries, accumulators and packaging, did not achieve the required collection, recovery and recycling levels, and therefore had to pay a product fee.

Currently, containers for electro-waste have been placed in the Comarch Group's facilities. Employees can hand over waste electrical and electronic equipment, as well as waste batteries and accumulators on an ongoing basis.

From November 2014, Comarch S.A. is a member of the Polish Chamber of Commerce for Environmental Protection, associating entrepreneurs who are waste recovery organizations and entrepreneurs placing on the market packaging, packaged products as well as electrical and electronic equipment.

8.7. The Degree of Compliance with Regulations

The Comarch Group has implemented a procedure for identifying and accessing legal requirements. At least once a year, an assessment of compliance with the applicable legal requirements and other requirements adopted for use by the Comarch Group is carried out. The results of the assessment are presented in the documentation prepared for the review of the Integrated Management System and presented to the Management Board.

E.7.3., E.7.4.

In the reporting period, no financial penalties and non-financial sanctions have been imposed on Comarch S.A. and the Comarch Group companies for non-compliance with environmental protection regulations.

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

E.7.1., E.7.2.

During the reporting period, there were no significant types of environmental pollution emitted by operating activities, and no environmental accidents and possible contamination occurred.

8.8. Activities for the Environment and Investments Related to Environmental Protection

Responsible Administration of Comarch Group Buildings - Energy Management, Photovoltaics, Rainwater and Waste Segregation

Comarch S.A. facilities are modern buildings with electricity and heat management systems. There are seven office buildings on the campus of the Comarch Group in Krakow, which employ over 3,500 people on a daily basis. The company also owns several buildings outside Krakow, two in Warsaw and one in Łódź. Additionally, the company rents over a dozen offices in Poland and abroad. Management of these properties is carried out taking into account pro-ecological practices, such as modernization of buildings and equipment, the use of renewable energy sources or the application of an appropriate purchasing policy. In facilities owned by the Comarch Group, i.e. in the Special Economic Zone in Kraków, Warsaw and Łódź, lamps are gradually replaced with new ones with LED technology as well as more modern

and energy-saving devices are introduced. There are bins in all buildings, which enable the segregation of rubbish into four categories: glass, paper, plastics and mixed waste.



At the beginning of 2018, Comarch S.A. began operation of the modern SSE7 office building, located in the Special Economic Zone in Krakow, within the campus at prof. Michał Życzkowski in Krakow. The building has an underground garage, ground floor, 4 usable floors and a technical floor on the roof of the building. The building has been designed with care for ecology and a friendly working environment, which is confirmed by the BREEAM Very Good certificate. The building offers a number of amenities, incl. contact of all work rooms with direct daylight, the possibility of airing all office rooms through opening windows, as well as internal and external spaces for recreation and relaxation. Battery charging stations have been installed in the underground garages of the building, which enable employees to use ecological electric vehicles. The distinguishing feature is the light shelves, designed on the southern and western facades, which have a double function: on the one hand, they shade the window strip from the sun, on the other, they reflect the light, illuminating the part of the office space located at the back of the road. In this way, electricity consumption is reduced. All rooms are equipped with a separate intelligent ventilation and air conditioning system, which is also a source of heating. At night, the air-conditioning works in

eco mode, and in the morning, it heats the room in advance to the temperature set on the controller. During the implementation of the Comarch SSE7 investment, care was also taken for the immediate surroundings of the building - trees and shrubs were planted.



In addition, due to the concern for the natural environment, photovoltaic cells were installed on the roof of the building, used to partially cover their own electricity demand and possible resale of excess energy produced to the power grid. These devices are capable of producing over 40,000 kWh of electricity.



Additionally, all Comarch Group buildings are equipped with modern ventilation systems with heat recovery. In two office buildings on the Krakow campus and in the facility in Łódź, systems that collect rainwater are installed. This water is used to care for green areas located on the company's premises.

We Are Building an Ecological Car Fleet

In 2020, 85% of cars met the stringent EURO6 emission standards, 14% were EURO5 standards, and only 1% were EURO4 or lower. In 2020, 13 vehicles with older emission standards were withdrawn from use. Diesel vehicles are gradually being phased out of the fleet and replaced by cleaner gasoline and hybrid cars. In 2020, due to the ongoing Covid-19 pandemic, fuel consumption in the Comarch Group decreased significantly due to the reduction in the number of delegations made by employees.

Employees Are Eco Too!

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

For the sake of the natural environment, the company's canteen, which is located on the Comarch campus in Krakow, organizes the "Come with your own cup for coffee" campaign. Instead of selling hot drinks in disposable dishes, restaurant staff can serve these drinks in cups brought by guests. The initiative's main goal is to prevent over-production of garbage. Additionally, in the break rooms in the Comarch Group buildings, water dispensers or devices that filter the water are installed. In this way, the company encourages employees to switch from bottled water to tap water.

Pro-Ecological Goals

Every year, environmental, energy and OHS programs are prepared, setting out goals and actions to reduce negative impacts on the environment and to raise employee awareness. The most important goals in taking active measures to reduce environmental pollution include maintaining the principles of separate waste collection and taking actions to increase employee awareness in the field of environmental protection and recycling. The indirect objectives related to the reduction of the negative environmental impact include those related to the improvement of the energy result, including:

- continuation of modernization of lighting in buildings and comprehensive modernization of lighting in Data Centre rooms (replacement with energy-saving LED sources),
- continuation of the fleet modernization process and organization of eco-driving trainings or employees.

Investments Related to Environmental Protection

The Comarch Group constantly modernizes air conditioning devices to be more environmentally friendly. Additionally, fluorescent lamps are successively replaced with LED light sources and more modern and energy-saving devices (EnergyStar) are installed.

In 2021 and in the following years, it is planned to install photovoltaic installations on selected buildings of Comarch S.A. located in the Special Economic Zone in Krakow.

The table below presents additional expenses for environmental protection related to the costs of meeting the obligations of collection, recovery and recycling of introduced electronic equipment, packaging, batteries and waste management at Comarch S.A. and in other companies of the Comarch Group in the years 2019 - 2020.

Expenditure on environmental protection in the field of waste disposal, recycling and recovery of introduced products	2020	2019
Comarch S.A.	PLN 3,128	PLN 3,113
Other companies of the Comarch Group	PLN 22,686	PLN 24,827

9. Assessment of the Significance of Aspects for the Environment

The significance of particular aspects for the Comarch Group (unless otherwise indicated) is defined as follows:

Category	Aspects	Significance of Aspects	Indicators by SIN
Managerial	Description of the business model and strategic development directions	High/medium/ <u>low</u>	G.1.1., G.1.2.
	Governance	High/medium/ <u>low</u>	G.2.1., G.2.2., G.2.3.
	Social and environmental risk management	High/medium/ <u>low</u>	G.3.1., G.3.2.
	Ethics management	High/ <u>medium</u> /low	G.4.1., G.4.2., G.4.3., G.4.4., G.4.5., G.4.6., G.4.7., G.4.8.
Environmental	Direct and indirect impact: raw materials and materials	High/ <u>medium</u> /low	E.1.1., E.1.2.
	Direct and indirect impact: fuel and energy	High/ <u>medium</u> /low	E.2.1., E.2.2., E.2.3.
	Direct and indirect impact: water	High/ <u>medium</u> /low	E.3.1., E.3.2., E.3.3.
	Direct and indirect impact: biodiversity	High/medium/ <u>low</u>	E.4.1., E.4.2., E.4.3., E.4.4.
	Direct and indirect impacts: emissions to the atmosphere	High/ <u>medium</u> /low	E.5.1., E.5.2., E.5.3., E.5.4.
	Direct and indirect impact: waste and sewage	High/ <u>medium</u> /low	E.6.1., E.6.2., E.6.3., E.6.4., E.6.5.

Social and employee	Other aspects of direct and indirect environmental impact	High/ <u>medium</u> /low	E.7.1., E.7.2., E.7.3., E.7.4., E.7.5., E.7.6.
	Extended environmental responsibility: products and services	High/ <u>medium</u> /low	E.8.1., E.8.2., E.8.3.
	Use of public aid and public orders	High/medium/ <u>low</u>	S.1.1., S.1.2.
	Employment level and remuneration level	High/ <u>medium</u> /low	S.2.1., S.2.2., S.2.3., S.2.4., S.2.5., S.2.6., S.2.7., S.2.8., S.2.9., S.2.10., S.2.11., S.2.12., S.2.13., S.2.14., S.2.15.
	Relations with the employee side and freedom of association	High/ <u>medium</u> /low	S.3.1., S.3.2., S.3.3., S.3.4., S.3.5., S.3.6.
	Occupational Health and Safety	<u>High</u> /medium/low	S.4.1., S.4.2., S.4.3., S.4.4., S.4.5., S.4.6., S.4.7., S.4.8., S.4.9., S.4.10., S.4.11., S.4.12.
	Development and education	High/ <u>medium</u> /low	S.5.1., S.5.2.
	Diversity management	High/ <u>medium</u> /low	S.6.1., S.6.2., S.6.3., S.6.4.
	Human rights	<u>High</u> /medium/low	S.7.1., S.7.2., S.7.3., S.7.4., S.7.5., S.7.6.
	Child labour and forced labour	High/ <u>medium</u> /low	S.8.1., S.8.2., S.8.3., S.8.4.
	Local communities and social involvement	High/ <u>medium</u> /low	S.9.1., S.9.2., S.9.3., S.9.4., S.9.5., S.9.6.
	Counteracting corruption	High/ <u>medium</u> /low	S.10.1., S.10.2., S.10.3.
	Safety of products and consumers	High/ <u>medium</u> /low	S.11.1., S.11.2., S.11.3.
	Child Labour	High/medium/ <u>low</u>	S.12.1., S.12.2., S.12.3.
	Privacy protection	<u>High</u> /medium/low	S.13.1., S.13.2., S.13.3.
	Product labelling	High/ <u>medium</u> /low	S.14.1., S.14.2., S.14.3.
	Other social and market issues	High/ <u>medium</u> /low	S.15.1., S.15.2., S.15.3., S.15.4., S.15.5., S.15.6.

10. Overview of SIN (Non-financial Reporting Standards)

SIN indicator	Disclosures	Placement in the Report (page number)
I. Management Area (G)		
G.1.1.	DESCRIPTION OF THE ADOPTED DEVELOPMENT STRATEGY WITH REGARD TO SOCIAL AND ENVIRONMENTAL ASPECTS	5
G.1.2.	CHARACTERISTICS OF THE ADOPTED BUSINESS MODEL, INCLUDING THE DESCRIPTION OF THE SUPPLY CHAIN, WITH SPECIAL VERSION OF THE DESCRIPTION OF SOCIAL AND ENVIRONMENTAL IMPACT	5 , 35
G.2.1.	DESCRIPTION OF THE MANAGEMENT STRUCTURE, CONTAINING INFORMATION IF ANY AND WHAT IS THE APPROACH TO MANAGE NON-FINANCIAL (SOCIAL, ENVIRONMENTAL ASPECTS) ASPECTS, THE LOOK OF THE INTERNAL RISK AND AUDIT MANAGEMENT SYSTEM WILL BE CONSIDERED	21 , 34
G.2.2.	LIST OF MANAGEMENT SYSTEM CERTIFICATES (e.g. ISO 9001, ISO 14001, OHSAS 18001)	19
G.2.3.	DESCRIPTION OF THE EXPORT CONTROL SYSTEM POLICY, WITH INDICATED MONITORING OF SOCIAL AND ENVIRONMENTAL ASPECTS OF ACTIVITY	20 , 34
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G.3.2.	LIST OF IDENTIFIED SOCIAL OR ENVIRONMENTAL RISKS ALONG WITH THEIR SHORT CHARACTERISTICS	20 , 23 , 25 , 26 , 27 , 29 , 33
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S.12.3.	FINANCIAL VALUE OF PENALTIES FOR NON-CONFORMITY WITH LAW AND REGULATIONS IN MATTERS RELATED TO THE RELIABILITY AND ETHICS FOR MARKETING COMMUNICATION (BY APPEALABLE AND UNAPPEALABLE).	39
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