

CODE OF ETHICS COMP S.A. CAPITAL GROUP.

Adopted by Resolution of the Board of Directors of Comp S.A. No. 1 dated March 8, 2023.
Consolidated text adopted by Resolution of the Board of Directors of Comp S.A. No. 4 dated
December 23, 2024.

VALUES OF THE CAPITAL GROUP

Comp S.A., headquartered in Warsaw, is a public company, which is the parent company of the entities, the current list of which can be found on the company's website at: www.comp.com.pl/o-comp/grupa-kapitalowa-comp/.

Comp S.A. and the subsidiaries referred to above form the "Comp S.A. Capital Group."

We are a responsible corporate group, and we want to act in accordance with norms and principles based on ethical standards desired around the world. The source of the norms and principles to which we adhere is a system of values common to all of us based on our tradition and culture. Thanks to the values we have adopted, we are building the position of the Comp Group

S.A. both for the benefit of the environment, the Comp S.A. Group employees themselves and other stakeholders.

The Comp Group is committed to building a culture of ethics to help fulfill its commitments and aspirations for sustainable development. We set standards higher than those imposed by law.

The declaration of ethical conduct contained in this Code (hereinafter "Code of Ethics") is our motivation and influences the direction and shape of our business decisions and actions. For our customers and our partners, this declaration is an assurance of fair and socially acceptable principles for the conduct of our business.

The Code of Ethics sets the framework and standards for our actions. It does not relieve our employees of the necessity to assess on their own whether a certain conduct supports the building of the reputation of the Comp S.A. Capital Group and the individual units comprising it as an honest and reliable business partner, and whether it does not expose the Comp S.A. Capital Group or its image to damage, and customers to lack of access to our products, services and solutions.

Each employee of the Comp S.A. Capital Group is obliged to act in external relations, as well as within the organization, in a manner consistent with the provisions of the Code of Ethics. We also expect that all our colleagues, companies and organizations cooperating with us are guided in their daily activities by respect for the principles of conduct we have adopted, and conduct their activities with observance of the principles of broadly understood integrity.

The Code of Ethics is binding on Comp S.A. and, under the rules adopted by the relevant bodies of Comp S.A.'s subsidiaries, also on entities in the Comp S.A. Capital Group. The Management Board of Comp S.A. will ensure that the standards established are implemented and put into practice throughout the Comp S.A. Capital Group.

GENERAL CONSIDERATIONS

The term "employee" means both an employee within the meaning of the Labor Code and a co-worker engaged on any other legal basis by Comp S.A. or another entity of the Comp S.A. Group, as long as the provisions of the Code of Ethics apply to it.

The term "stakeholder" means the Management Board, Supervisory Board, employees, shareholders, customers, suppliers and partners, and investors.

Some of the issues covered by the content of the Code of Ethics are or may be regulated by more detailed procedures or regulations .

The Code of Ethics is available to the public on Comp S.A.'s website at www.comp.com.pl, as well as on the intranet for employees, with the immediate supervisor and with the Compliance Officer.

The Code of Ethics was developed taking into account the European Sustainability Reporting Standards (ESRS).

FOR WHAT PURPOSE DID WE DEVELOP THE CODE OF ETHICS?

This document describes the process of creating ethical standards in our organization and the ways we use to ensure that all employees adhere to them. The Code of Ethics defines the key principles governing these standards, indicating how we build an ethical culture, respond to violations, and how we report possible irregularities.

WHO IS RESPONSIBLE FOR OVERSEEING THE PROVISIONS OF OUR CODE OF ETHICS?

The person responsible for overseeing the content of Comp S.A.'s Code of Ethics, for the implementation of procedures for reporting on the Code of Ethics, for the process of handling reports of suspected and/or confirmed violations of the provisions of the Code of Ethics is the Compliance Officer.

WHO IS AFFECTED BY OUR CODE OF ETHICS?

The Code of Ethics constitutes a commitment of each employee to comply with the norms and ethical standards adopted by us and the applicable laws, regardless of the type of contract linking him/her with a unit of the Comp S.A. Capital Group, position, seniority, location and working hours.

The Code of Ethics also applies to persons employed on a basis other than a contract of employment. As a result, both persons employed under a contract of employment, as well as those cooperating with entities of the Comp S.A. Capital Group under a civil law contract, temporary employees, interns or persons delegated to provide services to entities of the Comp S.A. Capital Group should know and comply with the principles contained in the Code of Ethics.

PRINCIPLES OF CONDUCT OF PERSONS TO WHOM THE CODE OF ETHICS IS ADDRESSED

The Code of Ethics describes the rules that apply to all employees. It indicates actions and attitudes that are permitted and categorically prohibited. The rules of conduct of those to whom the Code of Ethics is addressed include that:

- a) They create a sustainable organizational culture based on desirable values;
- b) consider environmental, social and governance ("ESG") factors in their actions;
- c) relationships with customers and business partners are based on trust, integrity and professionalism;
- d) in internal relations are guided by respect and value diversity;
- e) comply with generally applicable laws and internal policies;
- f) act ethically, including avoiding conflicts of interest;
- g) try to communicate in the simplest and most understandable way;
- h) counter unacceptable practices in the ,
- i) report violations or suspected violations of accepted ethical norms and standards and generally applicable laws to the immediate supervisor, Compliance Officer or other designated persons.

ATTITUDE OF THE MANAGEMENT

Comp Group executives, of all levels, are individuals whose attitude sets a good example and serves as a role model for other employees, according to the "**tone at the top**" principle.

In particular, the role of those in leadership positions is:

- a) Creating such conditions for employees to pursue goals and perform tasks that will foster work based on accepted ethical values;
- b) Promoting the standards and principles of conduct set forth in the Code of Ethics in daily practice and giving importance to ethical issues at work;
- c) Providing all employees with access to and the opportunity to familiarize themselves with the contents of the applicable Code of Ethics;
- d) Within the scope of its competence, providing subordinate employees with the necessary explanations or advice related to the resolution of ethical problems signaled by employees;
- e) Receiving reports from employees regarding situations that constitute or may constitute violations of the Code of Ethics and, within the scope of its authority under applicable , analyzing and responding to them;
- f) Taking action in response to behavior that could result in negative consequences for the Comp Group;
- g) Providing necessary support to employees who raise ethical concerns and protecting them from retaliation by those who engage in unethical practices.

WHAT TO DO IN A SITUATION THAT IS ETHICALLY QUESTIONABLE?

The primary source of knowledge about the principles and ethical standards of conduct adopted in the Comp S.A. Group is the Code of Ethics.

Knowing that life brings with it such instances that cannot be catalogued, let alone defined, we have assumed that there may be situations in which the provisions of the Code of Ethics are insufficient for their proper evaluation in relation to the ethical standards applicable to us. In such cases, each employee has the right to exercise his or her right to consult his or her doubts with his or her immediate supervisor or Compliance Officer.

In order to meet the needs of employees, we have adopted a kind of "CheckList" that can allow an employee to determine the next course of action. In case an employee does not know how to proceed in a particular situation, the answers to all or only some of the following questions may be helpful:

- a) Does my behavior / conduct in this, specific situation, comply with generally applicable laws and applicable internal procedures?
- b) Is my conduct/behavior consistent with the ethical values and principles described in the Code of Ethics?
- c) By acting in this way and not in another way, am I acting in accordance with my values and principles of conduct? What will I feel/feel if I behave this way?
- d) Will or can my behavior influence the decisions I make in performing my job duties?
- e) Would I like/want others to act like this on a basis?
- f) Would I like/want someone to act this way towards me?
- g) How would my supervisor and co-workers react to this situation?
- h) Could the situation under review even expose Comp S.A. Group units to property or image losses?

COMP S.A. ETHICAL VALUES SYSTEM.

The Comp Group's system of ethical values consists of respect, honesty, social responsibility, cooperation, business ethics, care for the environment, diversity and inclusion, professionalism, open communication, authenticity, empathy and courage. These values are kind of guideposts for our activities both inside and outside the organization. We base our system of values on the following international documents and the company's Board of Directors is committed to adhering to them, viz:

- a) OECD Guidelines for Multinational Enterprises;
- b) UN Guiding Principles on Business and Human Rights;
- c) Declaration of the International Labor Organization on Fundamental Principles and Rights at Work and the International Bill of Human Rights;
- d) EU Commission Delegated Regulation of July 31, 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting standards.

HAPPY

The most important thing is people. We treat people and work with respect. We treat our relations with employees and towards people and entities that use our services, products and solutions with respect. We strive to create a work environment free of unethical behavior, bullying and discrimination. We strive to create an environment characterized by respect for the dignity and diversity of employees. We want the workplace created by us to be conducive to the development of employees, the realization of their ambitions both professional and personal. We respect the right to privacy of both employees and those working with us.

INTEGRITY

Absolute compliance with the law is one of the pillars of our business because it determines the credibility and reputation of the Comp Group. Our employees, within the scope of their competence, are obliged to know the applicable legal requirements and act in accordance with them.

In our understanding, integrity also means acting in accordance with accepted ethical principles and good morals.

SOCIAL RESPONSIBILITY

Each employee feels responsible for the workplace and the quality of the tasks performed. We carry out the duties entrusted to us properly and with appropriate commitment. We take care of the property of the unit. We protect the unit from excessive risks. We have created an organization that is reliable and deserving of trust. We keep our commitments, commercial confidentiality and the confidentiality of information. To this end, we successfully implemented an information security system based on ISO 27001:2017-06 in 2022.

Comp S.A. Capital Group takes responsibility for making a positive impact on our communities and stakeholders. We actively support the development of local initiatives, charitable projects and other activities for the public good. We also encourage our employees to get involved in charitable activities and support initiatives for the common good.

COOPERATION

Teamwork in the Comp Group is based on the knowledge and different competencies of all employees.

We attach importance to proper communication. We strive to reach agreements and build lasting partnerships. We also value a good atmosphere of cooperation in our relations with colleagues.

We guarantee our employees working conditions conducive to their professional development. We pay special attention to their safety and health. We honor our employees' right to privacy.

We motivate employees to perform. We develop their talents and abilities. We have created the "We support passions" project. Thanks to it, a sports Comp Team was created - inspiring and giving a motivational boost to the entire team.

We provide our employees with access to the company's ongoing programs to improve knowledge and skills in accordance with the specifics of each position.

BUSINESS ETHICS

We believe that conducting business with honesty, integrity and transparency is the foundation of our stakeholders' trust. Guided by ethical principles, we create long-term value for customers, employees and shareholders. We expect all our employees to act ethically in all aspects of their work and to report any suspected unethical behavior.

ENVIRONMENTAL MANAGEMENT

We conduct our business in accordance with current environmental laws and regulations. We support employees' environmental attitudes and create awareness of the importance of environmental protection in our environment.

We regularly participate in the International Day Without Electro-waste. When designing the social rooms, we include spaces for garbage segregation. We have replaced plastic food utensils with biodegradable ones, and plastic cutlery with those made from wheat bran. In our other exciting initiative, we put the choice of a theme for the company calendar in the hands of employees - the title "Beauty of Nature" was chosen by a majority vote. We joined the worldwide campaign to save beneficial insects. There are bee colonies living on one of the buildings at Comp S.A. headquarters in Warsaw.

We strive to use the most environmentally neutral packaging possible for the devices we produce. Optimization from the design stage to printing technologies makes them environmentally friendly without losing any of their functionality. The smaller the box - the more goods can be transported in a delivery vehicle. Thus, the carbon footprint is reduced.

We are striving to thermally modernize our locations, as exemplified by the photovoltaic installation installed on the roof of the Novitus branch, which allows us to cover part of the current demand for electricity necessary for the operation of the company.

DIVERSITY AND INCLUSION

We value diversity and foster an inclusive work environment, valuing the unique perspectives, skills and experiences of our employees. We believe that a diverse team strengthens our ability to innovate and effectively respond to customer and stakeholder needs.

PROFESSIONALISM

Employees maintain a high level of professionalism in all work-related activities. This includes appropriate dress, courtesy and a positive attitude. By demonstrating professionalism, employees contribute to a positive image of Comp Group and a productive work environment.

OPEN COMMUNICATION

Openness, honesty and mutual respect in communication are key to building a positive work environment. Our employees actively listen, share ideas and concerns, and seek to understand the perspectives of others. Any conflicts are resolved through constructive dialogue and cooperation.

AUTHENTICITY

Our employees are well aware of their strengths and talents, constantly striving to develop their potential and become the best version of themselves. They respect and value diversity within the team, recognizing the value of different perspectives, experiences and skills. We believe that mutual understanding and acceptance of differences strengthen our organization and create an environment conducive to the development of all employees.

EMPATHY

Our employees approach others with empathy and understanding, demonstrating sensitivity to the needs, opinions and emotions of both colleagues, customers and the communities in which we operate. They make sure to listen attentively and respond respectfully, building relationships based on mutual support and trust. Their attitude allows us to create a friendly work environment and strengthens our relationship with the community, which is the foundation of our organizational culture based on cooperation and mutual respect.

ODWAGE

Our employees make bold decisions and openly express their opinions, while showing respect for others and nurturing a culture of mutual understanding. They focus on directness and authenticity in their communications, which fosters trust and transparency in professional relationships. They have the courage to admit mistakes and treat them as valuable lessons, learning from them for the future. They understand that making mistakes is a natural part of the process of development and discovering new opportunities, which inspires them to continue improving and seeking innovative solutions.

WE RESPECT THE DIGNITY OF EVERY HUMAN BEING

At Comp S.A. Group, we do not condone attitudes that violate the dignity of employees such as mocking, discriminatory, abusive behavior that harms their personal rights. We do not tolerate any manifestation of harassment or intimidation of employees aimed at lowering their self-esteem, isolation or exclusion from the team. To this end

An Anti-Discrimination Policy relating to bullying and discrimination has been introduced, with which employees are familiar.

We respect the dignity of others and observe the rules of personal culture.

We treat employees with respect, regardless of the form of employment. In accordance with the current Anti-Discrimination Policy, any discrimination on the basis of gender, age, origin, nationality, religion, sexual orientation, appearance, health, disability or trade union membership is prohibited.

We pay special attention to ensuring safe and healthy working conditions for our employees. Occupational safety and health protection of our employees and those who work with us are crucial to us. We are constantly taking measures to improve working conditions, including adherence to the work-life balance principle, which aims provide employees with a work-life balance.

IMPLEMENTATION PROCESS AND TRAINING

New employees are required to complete all tasks and implementation training, which may include orientation sessions, workshops and e-learning modules. The induction process is designed to help employees understand the company's culture, values and expectations, and provide them with the necessary tools and resources to succeed in their positions.

Employees are expected to participate in continuous professional development and training, both internally and externally. Continuous learning and skill development are essential to maintain professional competence and prepare employees for new challenges and responsibilities.

WE AVOID CONFLICTS OF INTEREST

At the company, we strive to avoid situations in which the individual interests of employees may conflict with the interests of the Comp S.A. Capital Group and its stakeholders. Therefore, we have adopted the principle that each of our employees is obliged to notify the Comp S.A. Capital Group unit in which he or she is employed of cases where he or she connections (e.g. financial or personal) with customers, entities engaged in competitive activities, contractors or other entities cooperating with the company, as well as the suspicion of the very possibility of a conflict of interest. To this end, in November 2021, we adopted a Conflict of Interest Management Policy, and each employee was required to familiarize himself with its contents and comply with it.

Proper management of conflicts of interest is part of the corporate culture and is the responsibility of our employees at all levels of the organizational structure. Special rules apply to members of the supervisory board and management board. They must disclose the emergence of a conflict of interest or the possibility of one. They must also refrain from discussing and voting on matters that may cause such a conflict in their relationship with a client of Comp S.A. Group entities.

We considered a conflict of interest to be a situation in which an employee knowingly makes a decision or acts on behalf of the entity in which he or she is employed, which is part of Comp S.A. Group. - in a way that brings or could at least potentially bring an advantage to him or his relative. A conflict of interest may also arise when circumstances arise that may lead to a contradiction between the interests of the employee and the interests of the unit in which he or she is employed as well as the entire Comp S.A. Capital Group, including in particular when:

- a) employee has a financial or personal reason to prefer a selected contractor over another contractor - this also applies to cooperation between units in the Comp S.A. Capital Group;
- b) an employee may gain a benefit or avoid a loss as a result of a loss or failure to gain a benefit by the entity in which he or she is employed (including losses or benefits with a reputational profile);
- c) the employee is a shareholder or owns shares of the counterparty entity, as well as when he or she sits on the management or supervisory body of the counterparty;
- d) The employee gives or receives a financial benefit, in connection with a service provided by or to a contractor;
- e) The employee and his relative remain in a relationship of direct subordination;
- f) activity of the employee outside the unit in which he/she is employed and the Comp S.A. Capital Group is incompatible with acting in the interest of the unit as well as the Comp S.A. Capital Group. Including, in particular, a conflict of interest may cause business, professional, political activities, use of the business potential of the unit in which he/she is employed and the Comp S.A. Capital Group, and information acquired in the performance of tasks for the unit in which he/she is employed, including confidential information.

WE DO NOT OFFER FINANCIAL BENEFITS

We do offer or give excessive or inappropriate personal or material benefits to establish or maintain business relationships.

In our business, we do not give or promise: money, gifts, services or other benefits to politicians, public officials, auditors, employees of organizations and other bodies, in order to induce them to take or refrain from taking certain actions in their official capacity.

WE APPLY FAIR COMPETITION RULES

We abide by the rules of fair competition. We do not provide customers and/or business partners with false information or information that may be considered ambiguous.

We do not use deception, insinuation or attempts to mislead

WE WANT TO BUILD POSITIVE RELATIONSHIPS WITH SUPPLIERS

The Comp Group, which operates in the IT industry, is often required to declare its adherence, both by ourselves and our suppliers, to all standards, including international standards for the protection of human rights, prohibition of child labor and forced labor, application of fair competition rules, anti-corruption and environmental protection.

Consequently, it is important to us that our suppliers know and respect the ethical values espoused by the Comp S.A. Group. When selecting suppliers, we act in accordance with the adopted internal procedures. We are guided by the principle of objectivity and equality of all entities applying for cooperation with us. We reliably provide information and evaluate the quality of cooperation with suppliers, striving to objectively and as quickly as possible clarify any doubts related to its course.

OTHER POLICIES ON ETHICAL ISSUES

Ethics is a very broad topic, so ethical issues are also described in detail in other policies:

- a) Compliance Policy;
- b) Supplier Code;
- c) Anti-Corruption Policy;
- d) Policy Against Prohibited Behavior;
- e) Conflict of Interest Management Policy;
- f) Procedure for Reporting Violations of the Law.

which are available at www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/