



**COMP SPÓŁKA
AKCYJNA**

116 Jutrzenki Street
02-230 Warsaw Poland

Management Board Report on the Activities of the Comp S.A. Group for 2024

Date of preparation: 15 April 2025

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INFORMATION ABOUT THE PARENT COMPANY

Company name	Comp Spółka Akcyjna
Registered office	Poland, 02-230 Warsaw, ul. Jutrzenki 116
Registration Court	District Court for the Capital City of Warsaw, 14th Commercial Division of the National Court Register
Business Register No.	0000037706
Tax Identification Number	522-00-01-694
REGON	012499190
BDO	000013641
Website	www.comp.com.pl

The core business of Comp S.A. (hereinafter also referred to as the Company or the Parent Company) according to the Polish Classification of Economic Activities (PKD) is IT-related activities:

- IT consultancy services – principal activity – 62.02.Z,
- manufacture of office machinery and equipment, excluding computers and peripheral equipment – 28.23.Z,
- repair and maintenance of electronic and optical equipment – 33.13.Z,
- wholesale of computers, peripheral equipment and software – 46.51.Z,
- wholesale of other office machinery and equipment - 46.66.Z,
- wired telecommunications activities – 61.10.Z,
- software-related activities – 62.01.Z,
- IT equipment management activities - 62.03.Z,
- Other information technology and computer-related services - 62.09.Z,
- repair and maintenance of computers and peripheral equipment - 95.11.Z.

The secondary business activities of Comp S.A. include, amongst others:

- manufacture of computers and peripheral equipment (division 26.20),
- manufacture of (tele)communications equipment (division 26.30),
- manufacture of other special-purpose machinery (division 28.99),
- research and development in the field of other natural and technical sciences (division 72.19),
- rental and leasing of office machinery and equipment, including computers (division 77.33),
- other non-school forms of education (division 85.59),
- wholesale of electronic and telecommunications equipment and parts thereof (division 46.52).

The duration of the Company – the Parent Company – is unlimited in accordance with the Articles of

Association. During the reporting period, the Company had the following self-accounting branches:

- Sales Technology Centre Branch, located at 118 Nawojowska Street in Nowy Sącz,
- The Warsaw IT Branch, located at 116 Jutrzenki Street in Warsaw.

The financial statements of Comp S.A. are the combined financial statements of the Company and its branches. Comp S.A. is not a subsidiary of any other entity.

The preparation of the financial statements was based on the assumption that the Parent Company and the companies comprising the Capital Group will continue as going concerns for the foreseeable future. There are no circumstances indicating a threat to the going concern. Further information on the going concern assumption is provided in Note 64 to the Consolidated Financial Statements.

Shareholders or the Supervisory Board have the right to amend the report prior to its approval by the General Meeting of Shareholders.

COMPOSITION OF THE PARENT COMPANY'S GOVERNING BODIES

During the period from 1 January 2024 to 31 December 2024, the Management Board consisted of:

- Robert Tomaszewski – Chairman of the Management Board,
- Krzysztof Morawski – Vice-Chairman of the Management Board,
- Andrzej Wawer – Vice-President of the Management Board,
- Jarosław Wilk – Vice-President of the Management Board.

From 1 January 2024 to 6 December 2024, the Supervisory Board consisted of:

- Grzegorz Należyty – Chairman of the Supervisory Board,
- Ryszard Trepczyński – Vice-Chairman of the Supervisory Board,
- Krystian Brymora – Member of the Supervisory Board,
- Piotr Nowjalis – Member of the Supervisory Board,
- Julian Kutrzeba – Member of the Supervisory Board,
- Szczepan Strublewski – Member of the Supervisory Board.

From 6 December 2024 to 31 December 2024, the Supervisory Board consisted of:

- Grzegorz Należyty – Chairman of the Supervisory Board,
- Ryszard Trepczyński – Vice-Chairman of the Supervisory Board,
- Krystian Brymora – Member of the Supervisory Board,
- Piotr Kwaśniewski – Member of the Supervisory Board,
- Julian Kutrzeba – Member of the Supervisory Board,
- Szczepan Strublewski – Member of the Supervisory Board.

In Current Report No. 41/2024 dated 31 October 2024, the Management Board of Comp S.A. announced that on 31 October 2024 it had received a resignation from Mr Piotr Nowjalis, a Member of the Company's Supervisory Board, from his position as a member of the Supervisory Board. The resignation was submitted with effect from the date of the next extraordinary general meeting of the Company, but no later than 6 December 2024.

On 6 December 2024, the Company's extraordinary general meeting appointed Mr Piotr Włodzimierz Kwaśniewski to the Company's Supervisory Board to complete the current two-year joint term of office, entrusting him with the role of member of the Company's Supervisory Board, as announced by the Company's Management Board in current report No. 50/2024 dated 6 December 2024.

Subsequently, on 18 December 2024, following the resignation, effective 6 December 2024, Mr Piotr Nowjalis from his position as a member of the Company's Supervisory Board (who was Chairman of the Supervisory Board's Audit Committee and Chairman of the Supervisory Board's Nomination and Remuneration Committee) and the appointment of Mr Piotr Kwaśniewski, a new member of the Supervisory Board appointed for the current term of office, The Company's Supervisory Board:

1. appointed Mr Szczepan Strublewski to serve as a member of the Supervisory Board's Audit Committee;
2. appointed Mr Ryszard Trepczyński as Chairman of the Supervisory Board's Audit Committee;
3. appointed Mr Ryszard Trepczyński to serve as a member of the Supervisory Board's Nomination and Remuneration Committee;
4. appointed Mr Grzegorz Należyty as Chairman of the Supervisory Board's Nomination and Remuneration Committee.

Accordingly, as of 18 December 2024 and as at 31 December 2024, the composition of the Company's Supervisory Board committees is as follows:

Audit Committee of the Supervisory Board of Comp S.A.:

- Mr Ryszard Trepczyński, Chairman of the Audit Committee of the Company's Supervisory Board;
- Mr Grzegorz Należyty;
- Mr Szczepan Strublewski.

Strategy Committee of the Supervisory Board of Comp S.A.:

- Mr Grzegorz Należyty, Chairman of the Strategy Committee of the Company's Supervisory Board;
- Mr Julian Kutrzeba;
- Mr Szczepan Strublewski.

Nomination and Remuneration Committee of the Supervisory Board of Comp S.A.:

- Mr Grzegorz Należyty, Chairman of the Nomination and Remuneration Committee of the Company's Supervisory Board;
- Mr Krystian Brymora;
- Mr Ryszard Trepczyński.

The Management Board of Comp S.A. announced the above changes in Current Report No. 53/2024 on 18 December 2024.

As at 31 December 2024 and as at the date of publication of this report, the composition of the Company's Management Board is as follows:

- Robert Tomaszewski – Chairman of the Management Board,
- Krzysztof Morawski – Vice-Chairman of the Management Board,
- Andrzej Wawer – Vice-President of the Management Board,
- Jarosław Wilk – Vice-President of the Management Board.

As at 31 December 2024 and as at the date of publication of this report, the composition of the Company's Supervisory Board is as follows:

- Grzegorz Należyty – Chairman of the Supervisory Board,
- Ryszard Trepczyński – Vice-Chairman of the Supervisory Board,
- Krystian Brymora – Member of the Supervisory Board,
- Piotr Kwaśniewski – Member of the Supervisory Board,
- Julian Kutrzeba – Member of the Supervisory Board,
- Szczepan Strublewski – Member of the Supervisory Board.

SHARE CAPITAL OF THE PARENT COMPANY

The share capital of Comp S.A. as at the balance sheet date amounted to PLN 11,295,797.50 and is divided into 4,518,319 shares, each with a nominal value of PLN 2.50

SHARE CAPITAL (STRUCTURE)	
Entitlement to dividends	from the date of acquisition
Ordinary shares	4,518,319
Including treasury shares*	297,245
Restrictions on share rights	-
Total number of shares	4,518,319
Total share capital	11,295,797.50
Nominal value of 1 share	PLN 2.50

* own shares held by the Parent Company.

The Company's share capital is divided into 4,518,319 shares, including:

- 47,500 Series A Shares,
- 1,260,000 Series B Shares,
- 150,527 Series C Shares,
- 210,870 Series E Shares,
- 91,388 Series G shares,
- 555,000 Series H Shares,
- 445,000 Series I shares,
- 607,497 Series J shares,
- 700,478 Series K shares,
- 333,931 Series L shares,
- 107,203 Series N shares,
- 8,925 Series M shares.

The Company had a contingent obligation to issue shares in connection with the employee incentive scheme described in Current Report 30/2020 of 31 August 2020 (“the Scheme”). Under the Programme for the years 2020–2022, no more than 177,545 Series A subscription warrants (“Warrants”) could be issued and subscribed for. Each Warrant conferred the right to subscribe for one Series M share of the Company. During the term of the Scheme, the Company offered a total of 25,968 Warrants. On 29 December 2023, the holders of 8,925 Series A subscription warrants submitted written declarations to the Company regarding the exercise of their rights under the Series A subscription warrants and the subscription of Series M Shares, and also made full payment for the Series M Shares. At the same time, the rights arising from Series A subscription warrants, in respect of which the right to subscribe for Series M Shares had not been exercised by 31 December 2023, expired on 31 December 2023. The National Depository for Securities S.A. (“KDPW”) published a notice regarding the registration of 8,925 Series M Shares in the securities depository under ISIN code: PLCMP0000017 as at 18 January 2024. Upon fulfilment of the conditions for their exercise, the warrants were included in the calculation of diluted earnings per share; however, given their number, this does not affect the final value of the Company’s earnings per share.

On 17 January 2024, with reference to current reports No. 46/2023 of 29 December 2023, No. 2/2024 of 5 January 2024, No. 4/2024 of 12 January 2024 and No. 5/2024 of 15 January 2024, the Management Board of Comp S.A. announced that on 17 January 2024 Krajowy Depozyt Papierów Wartościowych S.A. published a notice regarding the registration in the securities depository under ISIN code: PLCMP0000017, effective 18 January 2024, of a total of 116,341 ordinary bearer shares of the Company with a nominal value of PLN 2.50 per share, including:

1. 8,925 Series M ordinary bearer shares with a nominal value of PLN 2.50 each (“Series M Shares”) issued in connection with the conversion of Series A subscription warrants into Series M shares as part of a conditional increase in the Company’s share capital, based on Resolution No. 32/2020 of the Ordinary General Meeting of 31 August 2020, and
2. 107,416 Series N ordinary bearer shares with a nominal value of PLN 2.50 each (“Series N Shares”) issued as part of a public offering in connection with the merger of the Company with Zakłady Urządzeń Komputerowych Elzab S.A.

This means that the condition for the admission of Series M Shares and Series N Shares to trading on the Main Market of the Warsaw Stock Exchange S.A. as of 18 January 2024 has been met.

The Company’s Management Board has announced that, following the registration of Series M Shares with the National Depository for Securities (KDPW), Series M Shares have been credited to the securities accounts of seven eligible participants in the incentive scheme adopted by Resolution No. 31/2020 of the Ordinary General Meeting held on 31 August 2020 (“Participants”), who on 29 December 2023 submitted to the Company declarations to subscribe for Series M Shares in exercise of the rights attached to previously subscribed Series A subscription warrants. Upon entry into the account, the Series M Shares were effectively allocated to the Participants within the meaning of Article 451 § 2, second sentence, of the Commercial Companies Code.

Pursuant to Article 452 § 1 of the Commercial Companies Code, upon the recording of the Series M Shares in the account, the Participants acquired the rights attached to the Series M Shares and the Company’s share capital was increased from PLN 13,631,792.50 by an amount equal to the nominal value of the Series M Shares, i.e. by PLN 22,312.50, to PLN 13,654,105.00.

Consequently:

1. the Company’s share capital following the event amounted to PLN 13,654,105.00 and consisted of 5,461,642 shares with a nominal value of PLN 2.50 each, of which 8,925 shares were Series M Shares,
2. the total number of votes attached to all issued shares of the Company was therefore 5,461,642.

In addition, the Company has provided information regarding the issue of Series N Shares:

1. Series N Shares were issued to shareholders of ZUK Elzab S.A. in connection with the Merger, in proportion to their holdings of ZUK Elzab S.A. shares as at the specified reference date, i.e. 5 January 2024, based on a share exchange ratio of:
 - a. 0.1510 (Comp S.A. shares): 1 (ZUK Elzab S.A. shares) – for preference shares,
 - b. 0.0302 (Comp S.A. shares): 1 (ZUK Elzab S.A. shares) – for ordinary shares.
2. Series N shares were issued to the shareholders of ZUK Elzab S.A. on 18 January 2024,

3. the number of Series N Shares issued to shareholders of ZUK Elzab S.A., resulting from the application of the established share exchange ratio as at the reference date, is 106,993,
4. the number of Series N Shares that were not issued to shareholders of ZUK Elzab S.A. due to their being subject to sanctions or those for which it cannot be determined whether they are exempt from such sanctions is 0,
5. the number of Series N Shares that were not issued as a result of applying the share exchange ratio is 423. These shares were acquired by Comp S.A.

The total amount of costs included in the issue costs of Series N Shares issued by the Company as part of the public offering in connection with the Merger amounted to approximately PLN 910,157.00.

The above amount includes:

- costs of preparing and conducting the public offering of Series N Shares: approx. PLN 142,740.00;
- costs of underwriters' fees: PLN 0.00 – the Company did not incur any costs of underwriters' fees as it did not enter into any underwriting agreements in connection with the public offering of Series N Shares;
- costs relating to the preparation of the exemption document, including consultancy fees: approx. PLN 767,417.00;
- costs of promoting the public offering of Series N Shares: PLN 0.00.

The average cost of conducting the public offering per Series N share amounted to PLN 8.47. Costs related to the issue of Series N Shares were recognised as finance costs.

MERGER OF COMP S.A. WITH COMP CENTRUM INNOWACJI SP. Z O.O. AND POLSKI SYSTEM KORZYŚCI SP. Z O.O.

On 31 July 2024, the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register, registered the merger of the Company with Comp Centrum Innowacji Sp. z o.o., with its registered office in Warsaw, and Polski System Korzyści Sp. z o.o., with its registered office in Warsaw, in accordance with Resolution No. 21/2024 of the Ordinary General Meeting of Comp S.A. of 27 June 2024, as well as the registration of amendments to the Company's Articles of Association resulting from Resolutions No. 21/2024 and 22/2024 of the Ordinary General Meeting of the Company of 27 June 2024, the adoption of which the Company announced in Current Report No. 30/2024 dated 27 June 2024.

With reference to current reports No. 22/2024, 23/2024 and 24/2024 dated 24 May 2024 and No. 26/2024 dated 10 June 2024, the merger was carried out in accordance with Article 492(1)(1) of the Commercial Companies Code and in conjunction with Article 516(6) of the Commercial Companies Code, by transferring to the Company all the assets of Comp Centrum Innowacji Sp. z o.o. and Polski System Korzyści Sp. z o.o., comprising all rights and obligations (assets and liabilities) of those companies, without increasing the Company's share capital and without exchanging the shares of the acquired companies for shares in the Company, given that the Company holds 100% of the shares in the acquired companies.

Pursuant to Article 493 § 2 of the Commercial Companies Code, the merger took effect on the date of its entry in the register of entrepreneurs competent for Comp's registered office. This entry results in the removal of Comp Centrum Innowacji Sp. z o.o. and Polski System Korzyści Sp. z o.o. from the register of entrepreneurs of the National Court Register.

Pursuant to Article 494(1) of the Commercial Companies Code, as of 31 July 2024, the Company assumed all the rights and obligations of Comp Centrum Innowacji Sp. z o.o. and Polski System Korzyści Sp. z o.o. (universal succession).

Furthermore, the Company's Management Board notes that the amendment to the Company's Articles of Association concerns the updating of the Company's PKD classification in connection with the registration of the merger with Comp Centrum Innowacji Sp. z o.o. and Polski System Korzyści Sp. z o.o., as well as the reduction of the Company's share capital through the cancellation of 943,323 Series K ordinary bearer shares held by the Company, L and N [i.e. respectively: 679,639 ordinary bearer shares of series K; 263,471 series L ordinary bearer shares; 213 series N ordinary bearer shares], with a nominal value of PLN 2.50 each and a total nominal value of PLN 2,358,307.50, dematerialised and assigned the ISIN code: PLCMP0000017, representing in total 17.27% of the Company's share capital ("Treasury Shares"), which corresponded to 943,323 votes at the Company's general meeting, and which constituted 17.27% of the total number of votes at the Company's general meeting prior to the registration of the share capital reduction. The Own Shares were acquired by the Company, inter alia, as a result of mergers with other companies, and also for the purpose of their redemption, as part of the Company's share buy-back programmes, conducted on the basis of authorisations granted by the Company's General Meeting.

The redemption of the Own Shares took place in accordance with the procedure set out in Article 359 § 1 of the Commercial Companies Code as a voluntary redemption, preceded by the Company's acquisition of the shares intended for redemption. The Company's share capital was reduced by PLN 2,358,307.50, i.e. from PLN 13,654,105.00 to PLN 11,295,797.50, and is divided into 4,518,319 ordinary bearer shares with a nominal value of PLN 2.50 each, which, following the reduction of the share capital, correspond to the total number of votes at the Company's general meeting resulting from all 4,518,319 issued shares. The court registered the relevant amendment to the Company's Articles of Association in respect of §6 and §8.

STRUCTURE OF SHAREHOLDING AS AT THE BALANCE SHEET DATE OF 31 DECEMBER 2024, BASED ON INFORMATION PROVIDED TO THE COMPANY BY SHAREHOLDERS AND OTHER PUBLICLY AVAILABLE SOURCES.

As at the date of preparation of this report and as at the date of its publication, the shareholders listed below held, directly or indirectly, stakes exceeding 5% of the voting rights at the General Meeting of Shareholders of Comp S.A.

Shareholding structure of Comp S.A. as at 31 December 2024, broken down by number of shares and the resulting votes:

Shareholder	Number of shares	% of total shares	Number of votes at the AGM	% of votes at the AGM
Generali OFE managed by Generali PTE S.A.	805,641	17.83%	805,641	17.83%
Investment funds represented by AgioFunds TFI S.A.	701,663	15.53%	701,663	15.53%
Nationale-Nederlanden OFE managed by Nationale-Nederlanden PTE S.A.	481,280	10.65%	481,280	10.65%
Perea Capital Partners, LP	302,480	6.69%	302,480	6.69%
PKO BP Bankowy OFE and PKO BP DFE managed by PKO BP Bankowy PTE S.A.	275,874	6.11%	275,874	6.11%
Robert Tomaszewski*	243,938	5.40%	243,938	5.40%
Comp S.A.**	297,245	6.58%	297,245	6.58%
Other shareholders	1,410,198	31.21%	1,410,198	31.21%
Total	4,518,319	100.00%	4,518,319	100.00%

* Robert Tomaszewski holds:

– directly 2,007 ordinary bearer shares, representing 0.0444% of the share capital and corresponding to 2,007 votes, representing 0.0444% of the total number of votes at the general meeting of Comp S.A.;

– indirectly through CE Management Group Sp. z o.o., 241,931 ordinary bearer shares, representing 5.3544% of the share capital and corresponding to 241,931 votes, representing 5.3544% of the total number of votes at the general meeting of Comp S.A.;

** Status following the buyback by Comp S.A.: 148,245 own shares, representing 3.28% of the total number of shares. Comp S.A. is unable to exercise voting rights at the General Meeting.

During the reporting period, i.e. from 1 January 2024 to 31 December 2024, the following changes occurred in the shareholdings of entities holding, directly or indirectly through subsidiaries, more than 5% at the General Meeting of Shareholders of Comp S.A.

- **Generali Open Pension Fund (Generali OFE)**

As at the balance sheet date of 31 December 2024

Pursuant to Article 69 in conjunction with Article 87(1)(2b) of the Act of 29 July 2005 on Public Offerings and the Conditions for Introducing Financial Instruments to Organised Trading and on Public Companies, Generali Powszechne Towarzystwo Emerytalne S.A., which manages Generali Otwarty Fundusz Emerytalny (Generali OFE) with its registered office in Warsaw, has informed the Management Board of Comp S.A. that, as a result of the sale of shares, its share of the total number of votes in Comp S.A. has fallen below the threshold of 15% of the total number of votes in that company.

The Management Board of Comp S.A. announced the above change in Current Report No. 31/2024 dated 5 July 2024. Details of the transactions carried out are set out in the tables below.

Notification of transactions involving shares in Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of the total number of shares and % in the Shareholder Register
Generali Open Pension Fund managed by Generali Powszechne Pension Company S.A.	sale of shares	04/07/2024	100,000	1.83%

Shareholder	Position prior to the transaction			Status after the transaction			Current report	
	Number of shares / number of votes at the AGM	% of the total number of shares and % of the Board of Directors	% of votes at the AGM	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % on the Board of Directors	% of votes at the AGM	Report number	Date of report publication
Generali Open Pension Fund managed by Generali Powszechne Pension Company S.A.	905,641	16.58%	16.58%	805,641	14.75%	14.75%	31/2024	5 July 2024

The Management Board of Comp S.A. announced in current report No. 32/2024 on 31 July 2024 a reduction in the Company's share capital.

Detailed information in this regard is contained in the financial statements in the section "Shareholding structure of Comp S.A. as at the date of publication of these financial statements, broken down by number of shares and the resulting votes" in the section concerning Comp S.A.

The reduction in the Company's share capital, and consequently the reduction in the number of shares, had a direct impact on the change in the percentage shareholding of Generali OFE, managed by Generali PTE S.A., in the share capital and the percentage share of votes in the total number of votes.

Pursuant to Article 69 in conjunction with Article 87(1)(2b) of the Act of 29 July 2005 on Public Offerings and the Conditions for Introducing Financial Instruments to Organised Trading and on Public Companies, Generali Powszechne Towarzystwo Emerytalne S.A., which manages the Generali Open Pension Fund (Generali OFE), has informed the Management Board of Comp S.A. that, as a result of the registration of the reduction in the share capital of Comp S.A. on 31 July 2024, of which Comp S.A. gave notice in current report No. 32/2024 on 31 July 2024, the share of the total number of votes in Comp S.A. has increased above the threshold of 15% of the total number of votes in that company.

The Management Board of Comp S.A. reported the above change in current report No. 37/2024 dated 5 August 2024. Details of the changes are set out in the table below:

Entity	Number of shares prior to the share redemption and reduction of the share capital	Percentage of shares in the share capital prior to the share redemption and share capital reduction	Number of votes prior to the share redemption and share capital reduction*	Percentage of votes in the total number of votes prior to the share redemption and share capital reduction	Number of shares after the share redemption and share capital reduction	% share of shares in the share capital following the share redemption and reduction of the share capital	Number of votes following the share cancellation and reduction of the share capital	% of votes in the total number of votes following the share redemption and reduction of the share capital
Generali Open Pension Fund managed by Generali Powszechna Pension Company S.A.	805,641	14.75%	805,641	14.75%	805,641	17.83%	805,641	17.83%

- **Investment Funds represented by AgioFunds Towarzystwo Funduszy Inwestycyjnych S.A.**

As at the balance sheet date of 31 December 2024

The Management Board of Comp S.A. announced in current report No. 32/2024 on 31 July 2024 a reduction in the Company's share capital.

Detailed information in this regard is included in the financial statements under the section 'Comp Shareholders' S.A. as at the date of publication of this report, broken down by the number of shares and the corresponding number of votes" in the section concerning Comp S.A.

The reduction in the Company's share capital, and consequently the reduction in the number of shares, had a direct impact on the change in the percentage shareholding of AgioFunds Towarzystwo Funduszy Inwestycyjnych S.A., which manages Investment Funds, in the share capital and the percentage of votes in the total number of votes.

Pursuant to Article 69 in conjunction with Article 87(1)(2b) of the Act of 29 July 2005 on Public Offerings and the Conditions for Introducing Financial Instruments to Organised Trading and on Public Companies, AgioFunds Towarzystwo Funduszy Inwestycyjnych Spółka Akcyjna, with its registered office in Warsaw, acting on behalf of the investment funds it manages, has informed the Management Board of Comp S.A. that, following the registration of the reduction in the share capital of Comp S.A. on 31 July 2024, of which Comp S.A. gave notice in current report No. 32/2024 on 31 July 2024, the share of the total number of votes in Comp S.A. has increased above the threshold of 15% of the total number of votes in that company.

The Management Board of Comp S.A. reported the above change in current report No. 36/2024 dated 5 August 2024.

Details of the changes are set out in the table below:

Entity	Number of shares prior to the share redemption and share capital reduction	Percentage of shares in the share capital prior to the share redemption and reduction of the share capital	Number of votes prior to the share redemption and reduction of the share capital*	% of votes in the total number of votes prior to the share redemption and share capital reduction	Number of shares following the share redemption and reduction of the share capital	% share of shares in the share capital following the share redemption and reduction of the share capital	Number of votes following the share redemption and reduction of share capital	Percentage of votes out of the total number of votes following the share cancellation and reduction of the share capital
Investment funds represented by AgioFunds TFI S.A., including:	701,663	12.84%	701,663	12.84%	701,663	15.53%	701,663	15.53%
Agio Small and Medium-sized Companies Sub-fund	4,727	0.09%	4,727	0.09%	4,727	0.10%	4,727	0.10%
Beta of the sWIG80TR ETF Closed-End Investment Fund	10,046	0.18%	10,046	0.18%	10,046	0.22%	10,046	0.22%
Sub-fund 1*	542,600	9.93%	542,600	9.93%	542,600	12.01%	542,600	12.01%
Arrow Closed-End Investment Fund	144,290	2.64%	144,290	2.64%	144,290	3.19%	144,290	3.19%

* Following the registration of a capital reduction on 31 July 2024 by the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register, in Comp S.A., as announced by the Company in current report No. 32/2024 on 31 July 2024. Value FIZ sub-fund 1 increased its holding to over 10%, and in total, the funds managed by AGIOFUNDS TFI S.A. exceeded the 15% threshold of voting rights held at the Company's General Meeting of Shareholders.

- **Nationale-Nederlanden OFE managed by Nationale-Nederlanden PTE S.A.**

As at the balance sheet date of 31 December 2024

The Management Board of Comp S.A. announced in current report No. 32/2024 on 31 July 2024 a reduction in the Company's share capital.

Detailed information in this regard is included in the financial statements in the section "Shareholding structure of Comp S.A. as at the date of publication of these financial statements, broken down by number of shares and the resulting votes" in the section concerning Comp S.A.

The reduction in the Company's share capital, and consequently the reduction in the number of shares, had a direct impact on the change in the percentage shareholding of the shareholder Nationale-Nederlanden OFE, managed by Nationale-Nederlanden PTE S.A., in the share capital and the percentage share of votes in the total number of votes.

Pursuant to Article 69 in conjunction with Article 87(1)(2b) of the Act of 29 July 2005 on Public Offerings and the Conditions for Introducing Financial Instruments to Organised Trading and on Public Companies, Nationale-Nederlanden Powszechnie Towarzystwo Emerytalne S.A., the manager of the Nationale-Nederlanden Open Pension Fund, has informed the Management Board of Comp S.A. that, following the registration of the reduction in the share capital of Comp S.A. on 31 July 2024, as announced by Comp S.A. in its current report No. 32/2024 on 31 July 2024, the share of the total number of votes in Comp S.A. has increased above the threshold of 10% of the total number of votes in that company.

The Management Board of Comp S.A. announced the above change in Current Report No. 35/2024 dated 2 August 2024. Details of the changes are set out in the table below:

Entity	Number of shares prior to the share redemption and reduction of the share capital	% share of shares in the share capital prior to the share redemption and share capital reduction	Number of votes prior to the share redemption and share capital reduction*	% of votes in the total number of votes prior to the share redemption and share capital reduction	Number of shares following the share redemption and reduction of the share capital	Percentage of shares in the share capital following the share redemption and reduction of the share capital	Number of votes following the share redemption and reduction of the share capital	% share of votes in the total number of votes following the share redemption and reduction of the share capital
Nationale-Nederlanden Open Pension Fund managed by Nationale-Nederlanden Powszechnie Towarzystwo Emerytalne S.A.	481,280	8.81%	481,280	8.81%	481,280	10.65%	481,280	10.65%

- **PKO BP Bankowy OFE and PKO BP DFE, managed by PKO BP Bankowy PTE S.A.**

As at the balance sheet date of 31 December 2024

Pursuant to Article 69 in conjunction with Article 87(1)(2b) of the Act of 29 July 2005 on Public Offerings and the Conditions for Introducing Financial Instruments to Organised Trading and on Public Companies, PKO BP Bankowy Powszechnie Towarzystwo Emerytalne S.A., which manages the PKO BP Bankowy Open-Ended Pension Fund and the PKO BP Voluntary Pension Fund, informed the Management Board of Comp S.A. that, as a result of the sale of shares, there has been a cumulative increase in the share of the total number of votes in Comp S.A. above the threshold of 5% of the total number of votes in that company.

The Management Board of Comp S.A. announced the above change in Current Report No. 18/2024 dated 13 May 2024. Details of the transactions carried out are set out in the tables below.

Notification of transactions involving shares in Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of the total number of shares and % in the Shareholder Register
PKO BP Bankowy OFE and PKO BP DFE managed by PKO BP Bankowy PTE	acquisition of shares	08.05.2024	3,337	0.06%

Shareholder	Position prior to the transaction			Status after the transaction			Current report	
	Number of shares / number of votes at the AGM	% of total shares and % on the Board of Directors	% of votes at the AGM	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % on the Board	% of votes at the AGM	Report number	Date of report publication
PKO BP Bankowy PTE S.A. acting on behalf of the pension funds under management, namely: PKO BP Bankowy OFE and PKO DFE, including:	272,537	4.99%	4.99%	275,874	5.05%	5.05%	18/2024	13 May 2024
PKO BP Bank Pension Fund	267,968	4.91%	4.91%	271,305	4.97%	4.97%	18/2024	13 May 2024
PKO BP DFE	4,569	0.08%	0.08%	4,569	0.08%	0.08%	18/2024	13 May 2024

The Management Board of Comp S.A. announced in current report No. 32/2024 on 31 July 2024 a reduction in the Company's share capital.

Detailed information in this regard is contained in the financial statements in the section "Shareholding structure of Comp S.A. as at the date of publication of these financial statements, broken down by number of shares and the votes attached thereto" in the section concerning Comp S.A.

The reduction in the Company's share capital, and consequently the reduction in the number of shares, had a direct impact on the change in the percentage shareholdings in the share capital and the percentage share of votes in the total number of votes held by the shareholders PKO BP Bankowy OFE and PKO Dobrowolny Fundusz Emerytalny, managed by PKO BP Bankowy PTE S.A.

Pursuant to Article 69 in conjunction with Article 87(1)(2b) of the Act of 29 July 2005 on Public Offerings and the Conditions for Introducing Financial Instruments to Organised Trading and on Public Companies, PKO BP Bankowy Powszechnie Towarzystwo Emerytalne S.A., the manager of the PKO BP Bankowy Open Pension Fund and the PKO BP Voluntary Pension Fund, has informed the Management Board of Comp S.A. that, following the registration of the reduction in the share capital of Comp S.A. on 31 July 2024, which Comp S.A. announced in current report No. 32/2024 on 31 July 2024, PKO BP Bankowy Otwarty Fundusz Emerytalny increased its share of the total number of votes in Comp S.A. above the threshold of 5% of the total number of votes in that company.

The Management Board of Comp S.A. announced the above change in Current Report No. 34/2024 dated 2 August 2024.

Details of the changes are set out in the table below:

Entity	Number of shares prior to the share redemption and reduction of the share capital by	% share of shares in the share capital prior to the share redemption and share capital reduction	Number of votes prior to the share redemption and share capital reduction*	% share of votes in the total number of votes prior to the share redemption and share capital reduction	Number of shares following the share redemption and reduction of the share capital	Percentage of shares in the share capital following the share redemption and reduction of the share capital	Number of votes following the share redemption and reduction of the share capital	% share of votes in the total number of votes following the share redemption and reduction of the share capital
PKO BP Bankowy PTE S.A., acting on behalf of the pension funds it manages, namely: PKO BP Bankowy OFE and PKO DFE, including:	275,874	5.05%	275,874	5.05%	275,874	6.10%	275,874	6.10%
PKO BP Bank Pension Fund	271,305	4.97%	271,305	4.97%	271,305	6.00%	271,305	6.00%
PKO BP DFE	4,569	0.08%	4,569	0.08%	4,569	0.10%	4,569	0.10%

- **Perea Capital Partners, LP**

The Management Board of Comp S.A. announced in current report No. 32/2024 on 31 July 2024 a reduction in the Company's share capital.

Detailed information in this regard is contained in the financial statements in the section "Shareholding structure of Comp S.A. as at the date of publication of this report, broken down by number of shares and the resulting votes" in the section concerning Comp S.A.

The reduction in the Company's share capital, and consequently the reduction in the number of shares, had a direct impact on the change in Perea Capital Partners, LP's percentage shareholding in the share capital and percentage share of votes in the total number of votes.

Details of the changes are set out in the table below:

Entity	Number of shares prior to the share redemption and reduction of the share capital	% shareholding in the share capital prior to the share redemption and reduction of the share capital	Number of votes prior to the share cancellation and reduction of the share capital*	% of votes in the total number of votes prior to the share redemption and share capital reduction	Number of shares following the share redemption and reduction of the share capital	% share of shares in the share capital following the share redemption and reduction of the share capital	Number of votes following the share redemption and reduction of the share capital	% of votes in the total number of votes following the share redemption and reduction of the share capital
Perea Capital Partners, LP	302,480	5.54%	302,480	5.54%	302,480	6.69%	302,480	6.69%

- **Comp S.A.**

As at the balance sheet date of 31 December 2024

The Management Board of Comp S.A., with reference to current reports No. 46/2023 of 29 December 2023, No. 2/2024 of 5 January 2024, No. 4/2024 of 12 January 2024 and No. 5/2024 of 15 January 2024, announced on 17 January 2024 that on 17 January 2024 Krajowy Depozyt Papierów Wartościowych S.A. published a notice regarding the registration in the securities depository, effective 18 January 2024, of a total of

116,341 ordinary bearer shares of the Company, including:

- 1) 8,925 Series M ordinary bearer shares issued in connection with the conversion of Series A subscription warrants into Series M shares as part of a conditional increase in the Company's share capital, pursuant to Resolution No. 32/2020 of the Ordinary General Meeting of 31 August 2020; and
- 2) 107,416 Series N ordinary bearer shares issued as part of a public offering in connection with the merger of the Company with ZUK Elzab S.A.

The above means that the condition for the admission of series M shares and series N shares to trading on the Main Market of the Warsaw Stock Exchange S.A. as of 18 January 2024 has been met.

The Company's Management Board also announced in the aforementioned current report that, following the registration of Series M shares with KDPW, Series M shares were credited to the securities accounts of 7 eligible participants in the incentive scheme adopted by Resolution No. 31/2020 of the Ordinary General Meeting of 31 August 2020, who, on 29 December 2023, submitted statements to the Company regarding the subscription of Series M shares in exercise of the rights attached to previously subscribed Series A subscription warrants. Upon being credited to the account, the Series M shares were effectively allocated to the Participants within the meaning of Article 451 § 2, second sentence, of the Commercial Companies Code (KSH).

Pursuant to Article 452 § 1 of the Commercial Companies Code, upon the recording of the Series M shares in the account, the Participants acquired the rights attached to the Series M shares and the Company's share capital was increased from PLN 13,631,792.50 by an amount equal to the nominal value of the Series M shares, i.e. by PLN 22,312.50, to PLN 13,654,105.00.

Consequently, the Company's share capital currently amounts to PLN 13,654,105.00 and consists of 5,461,642 shares, of which 8,925 are Series M shares. The total number of votes attached to all the Company's issued shares is therefore 5,461,642.

The increase in the Company's share capital, and consequently the increase in the number of shares, had a direct impact on the change in the percentage share of shares in the share capital and the percentage share of votes in the total number of votes.

The Management Board of Comp S.A. reported the above change in Current Report No. 6/2024 on 17 January 2024. The above changes are described in the table:

Entity	Number of shares prior to the share capital increase	% shareholding in the share capital prior to the share capital increase	Number of votes prior to the share capital increase	Percentage of votes out of the total number of votes prior to the share capital increase	Number of shares following the share capital increase	% share of shares in the share capital following the share capital increase	Number of votes following the share capital increase	% share of votes in the total number of votes following the share capital increase
Comp S.A. together with its subsidiaries*	974,438	17.87%	974,438	17.87%	974,651	17.85%	974,651	17.85%

* on 18 January 2024 the shares referred to in point 6.1 of the document "Plan for the merger of Comp Spółka Akcyjna, with its registered office in Warsaw, with Zakłady Urządzeń Komputerowych 'Elzab' Spółka Akcyjna, with its registered office in Zabrze", available online at: <https://www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/> under the heading "Documentation – merger with Elzab", i.e. merger shares which were not issued to the shareholders of Zakłady Urządzeń Komputerowych "Elzab" S.A. with its registered office in Zabrze due to the share exchange ratio adopted in the aforementioned merger plan and the rounding described therein.

The Management Board of Comp S.A. has announced that, pursuant to Article 362(1)(5) 5 of the Commercial Companies Code and Resolution No. 30/2020 of the Ordinary General Meeting of Comp Spółka Akcyjna of 30 August 2020 on granting authorisation to the Company's Management Board to acquire own shares, amended on 30 June 2023 by Resolution No. 22/2023 of 30 June 2023 of the Company's Ordinary General Meeting, in pursuance of the "Invitation to submit offers to sell shares in Comp S.A." announced on 29 February 2024, announced in Current Report No. 10/2024 of 29 February 2024, the Company acquired 117,672 shares. The shares in question represent 2.16% of the share capital and confer 117,672 votes at the Company's General Meeting, which constitutes 2.16% of the total number of votes at the Company's General Meeting.

At the same time, the Company notified the Polish Financial Supervision Authority that, as a result of the acquisition in question, there had been a change in the previously held share of over 10% of the total number of votes by entities from the Comp S.A. Capital Group by at least 2% of the total number of votes.

Prior to the transaction, the Company and its subsidiaries held 974,651 shares, representing 17.85% of the share capital and conferring 974,651 votes at the Company's general meeting, which constituted 17.85% of the total number of votes at the Company's general meeting.

Following the transaction, the Company, together with its subsidiaries, holds 1,092,323 shares, representing 20.00% of the share capital and conferring 1,092,323 votes at the Company's general meeting, which constitutes 20.00% of the total number of votes at the Company's general meeting.

No voting rights are exercised at the Company's General Meeting in respect of the treasury shares held by the Company and its subsidiaries. Pursuant to § 2(9) of the Resolution, the treasury shares acquired by the Company may be cancelled on the basis of a separate resolution of the General Meeting.

The Management Board of Comp S.A. reported the above change in Current Report No. 11/2024 dated 15 March 2024. Details of the transactions carried out are presented in the tables below.

Notice of a transaction involving shares in Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % of voting rights
Comp S.A.	acquisition of shares	15 March 2024	117,672	2.16%

Entity	Number of shares prior to the share acquisition own	% of shares in the share capital prior to the share buyback	Number of votes prior to the share buyback	% of votes in the total number of votes prior to the share buyback	Number of shares following the share buyback	Percentage of shares in the share capital following the share buyback	Number of votes following the share buyback	Percentage of votes in the total number of votes following the share buyback
Comp S.A. together with its subsidiaries, including:	974,651	17.85%	974,651	17.85%	1,092,323	20.00%	1,092,323	20.00%
Comp S.A.	295,012	5.41%	295,012	5.41%	412,684	7.56%	412,684	7.56%
Comp Innovation Centre Ltd.	679,639	12.44%	679,639	12.44%	679,639	12.44%	679,639	12.44%

Following the announcement by the Management Board of Comp S.A. (current report No. 32/2024 of 31 July 2024) regarding the registration on 31 July 2024 by the District Court for the Capital City of Warsaw in Warsaw, 14th Commercial Division of the National Court Register, of the merger of Comp S.A. with Comp Centrum Innowacji Sp. z o.o. with its registered office in Warsaw and Polski System Korzyści Sp. z o.o. with its registered office in Warsaw, in accordance with Resolution No. 21/2024 of the Ordinary General Meeting of Comp S.A. of 27 June 2024, as well as the registration of amendments to the Company's Articles of Association resulting from Resolutions No. 21/2024 and 22/2024 of the Ordinary General Meeting of the Company dated 27 June 2024, the adoption of which Comp S.A. announced in current report No. 30/2024 dated 27 June 2024, changes have also occurred in the shareholdings of entities within the Company's capital group.

With reference to current reports No. 22/2024, 23/2024 and 24/2024 dated 24 May 2024 and No. 26/2024 dated 10 June 2024, the merger was carried out in accordance with Article 492(1)(1) of the Commercial Companies Code and in conjunction with Article 516(6) of the Commercial Companies Code, by transferring to the Company all the assets of Comp Centrum Innowacji Sp. z o.o. and Polski System Korzyści Sp. z o.o., comprising all rights and obligations (assets and liabilities) of those companies, without increasing the Company's share capital and without exchanging the shares of the acquired companies for shares in the Company, given that the Company holds 100% of the shares in the acquired companies.

Pursuant to Article 493 § 2 of the Commercial Companies Code, the merger took effect on the date of its entry in the register of entrepreneurs competent for Comp's registered office. This entry results in the removal of Comp Centrum Innowacji Sp. z o.o. and Polski System Korzyści Sp. z o.o. from the register of entrepreneurs of the National Court Register.

Pursuant to Article 494(1) of the Commercial Companies Code, as of 31 July 2024, the Company assumed all the rights and obligations of Comp Centrum Innowacji Sp. z o.o. and Polski System Korzyści Sp. z o.o. (universal succession).

Furthermore, the Company's Management Board notes that the amendment to the Company's Articles of Association concerns the updating of the Company's PKD classification in connection with the registration of the merger with Comp Centrum Innowacji Sp. z o.o. and Polski System Korzyści Sp. z o.o., as well as the reduction of the Company's share capital through the cancellation of 943,323 Series K ordinary bearer shares held by the Company, L and N (i.e. respectively: 679,639 Series K ordinary bearer shares; 263,471 Series L ordinary bearer shares; 213 ordinary bearer shares of series N), representing a total of 17.27% of the Company's share capital, which corresponded to 943,323 votes at the Company's general meeting, and which constituted 17.27% of the total number of votes at the Company's general meeting prior to the registration of the reduction in share capital. The Treasury Shares were acquired by the Company, inter alia, as a result of mergers with other companies, and also for the purpose of their redemption, as part of the Company's share buy-back programmes, conducted on the basis of authorisations granted by the Company's General Meeting.

The redemption of Own Shares took place in accordance with the procedure set out in Article 359(1) of the Commercial Companies Code as a voluntary redemption, preceded by the Company's acquisition of the shares intended for redemption. The Company's share capital was reduced by PLN 2,358,307.50, i.e. from PLN 13,654,105.00 to PLN 11,295,797.50 and is divided into 4,518,319 ordinary bearer shares, which, following the reduction of the share capital, correspond to the total number of votes at the Company's general meeting resulting from all issued shares, numbering 4,518,319.

Table concerning the acquisition of the Company's shares by way of universal succession by Comp S.A.

Entity	Number of shares prior to the share buyback	% share of shares in the share capital prior to the share buyback	Number of votes prior to the share buyback	Percentage of votes out of the total number of votes prior to the share buyback	Number of shares following the share buyback	% share of shares in the share capital following the share buyback	Number of votes following the share buyback	% of votes in the total number of votes following the share buyback
Comp S.A. together with its subsidiaries, including:	1,092,323	20.00%	1,092,323	20.00%	-	-	-	-
Comp S.A.	412,684	7.56%	412,684	7.56%	1,092,323	20.00%	1,092,323	20.00%
Comp Innovation Centre Ltd.	679,639	12.44%	679,639	12.44%	-	-	-	-

Table concerning the redemption by Comp S.A. of ordinary bearer shares of series K, L and N

Notice of a transaction involving shares in Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % of voting rights
Comp S.A.	Redemption of series K, L and N ordinary bearer shares. Including:	31 July 2024	943,323	17.27%
	<i>Redemption of Series K ordinary bearer shares</i>	31 July 2024	679,639	12.44
	<i>Redemption of Series L ordinary bearer shares</i>	31 July 2024	263,471	4.82%
	<i>Redemption of Series N ordinary bearer shares</i>	31 July 2024	213	0.004%

On 31 July 2024, the Management Board of Comp S.A. notified the Polish Financial Supervision Authority that, following the court's registration of the reduction in the Company's share capital and the redemption of 943,323 of the Company's shares (current report No. 32/2024) the total shareholding of entities within the Company's capital group has changed by at least 16.70% of the total number of votes, i.e. a reduction of 16.70% of the total number of votes, and in the case of the Company, has been reduced directly by 4.26% of the total number of votes.

The aforementioned transactions involving the redemption of Series K, L and N ordinary bearer shares and the reduction of the share capital of Comp S.A. resulted in Comp S.A.'s share of the total number of votes falling below the 5% threshold of the total number of votes in the Company.

The Management Board of Comp S.A. reported the above change in Current Report No. 33/2024 dated 31 July 2024. Details of the transactions carried out are presented in the tables below.

No voting rights are exercised at the Company's general meeting in respect of the Company's own shares.

Entity	Number of shares prior to the redemption of series K, L and N ordinary bearer shares	% share of shares in the share capital prior to the redemption of series K, L and N ordinary bearer shares	Number of votes prior to the redemption of series K, L and N ordinary bearer shares	% of votes in the total number of votes prior to the redemption of Series K, L and N ordinary bearer shares	Number of shares following the cancellation of Series K, L and N ordinary bearer shares	Percentage of shares in the share capital following the redemption of Series K, L and N ordinary bearer shares	Number of votes following the redemption of Series K, L and N ordinary bearer shares	Percentage of votes in the total number of votes following the redemption of Series K, L and N ordinary bearer shares
Comp S.A.	1,092,323	20.00%	1,092,323	20.00%	149,000	3.30%	149,000	3.30%

The Management Board of Comp S.A. has announced that, pursuant to Article 362(1)(5) of the Commercial Companies Code and Resolution No. 23/2024 of the Ordinary General Meeting of Comp Spółka Akcyjna dated 27 June 2024 concerning the authorisation of the Company's Management Board to acquire treasury shares, in accordance with the "Invitation to submit offers to sell shares in Comp S.A." announced on 29 June 2024, as disclosed in Current Report No. 45/2024 of 29 November 2024, the Company has acquired 148,245 shares. The shares in question represent 3.28% of the share capital and confer 148,245 votes at the Company's general meeting, which constitutes 3.28% of the total number of votes at the Company's general meeting.

At the same time, the Company notified the Polish Financial Supervision Authority that, as a result of this acquisition, the number of own shares held by the Company exceeded 5% of the total number of votes in the Company.

Prior to the transaction, the Company held 149,000 shares, which represented 3.30% of the share capital and conferred 149,000 votes at the Company's general meeting, representing 3.30% of the total number of votes at the Company's general meeting.

Following the transaction, the Company holds 297,245 shares, representing 6.58% of the share capital and conferring 297,245 votes at the Company's general meeting, which constitutes 6.58% of the total number of votes at the Company's general meeting.

No voting rights are exercised at the Company's general meeting in respect of treasury shares held by the Company and its subsidiaries. Pursuant to § 2(9) of the Resolution, treasury shares acquired by the Company may be cancelled on the basis of a separate resolution of the general meeting.

The Management Board of Comp S.A. reported the above change in Current Report No. 51/2024 dated 17 December 2024. Details of the transactions carried out are presented in the tables below.

Notification of transactions in the shares of Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % of voting rights
Comp S.A.	acquisition of shares	16 December 2024	148,245	3.28%

Entity	Number of shares prior to the share acquisition own	% of shares in the share capital prior to the share buyback	Number of votes prior to the share buyback	% of votes in the total number of votes prior to the share buyback	Number of shares after the share buyback	% share of shares in the share capital after the share buyback	Number of votes following the share buyback	Percentage of votes in the total number of votes following the share buyback
Comp S.A.	149,000	3.30%	149,000	3.30%	297,245	6.58%	297,245	6.58%

- **Other shareholders of Comp S.A.**

The Management Board of Comp S.A. announced in Current Report No. 6/2024 on 17 January 2024 an increase in the Company's share capital.

Detailed information in this regard is contained in the financial statements in the section "Shareholding structure of Comp S.A. as at the date of publication of these financial statements, broken down by number of shares and the resulting votes" in the section concerning Comp S.A.

The increase in the Company's share capital, and consequently the increase in the number of shares, had a direct impact on the change in all Shareholders' percentage holdings of shares in the share capital and their percentage share of votes in the total number of votes.

The Management Board of Comp S.A. reported the above change in Current Report No. 6/2024 on 17 January 2024.

The details of the changes are set out in the table below:

Entity	Number of shares prior to the share capital increase	% share of shares in the share capital prior to the share capital increase	Number of votes prior to the share capital increase	% share of votes in the total number of votes prior to the share capital increase	Number of shares after the share capital increase	% share of shares in the share capital after the share capital increase	Number of votes following the share capital increase	% of votes as a proportion of the total number of votes following the share capital increase by
Generali Open Pension Fund (Generali OFE)	1,021,971	18.74%	1,021,971	18.74%	1,021,971	18.71%	1,021,971	18.71%
Investment Funds represented by AgioFunds Towarzystwo Funduszy Inwestycyjnych Spółka Akcyjna	660,048	12.10%	660,048	12.10%	660,048	12.09%	660,048	12.09%
Nationale-Nederlanden Open Pension Fund and Nationale-Nederlanden Voluntary Pension Fund, represented by Nationale-Nederlanden Powszechnie Towarzystwo Emerytalne S.A.	573,828	10.52%	573,828	10.52%	573,828	10.51%	573,828	10.51%
Perea Capital Partners, LP	302,480	5.55%	302,480	5.55%	302,480	5.54%	302,480	5.54%
Robert Tomaszewski*	275,856	5.06%	275,856	5.06%	275,856	5.05%	275,856	5.05%
Other shareholders	1,643,673	30.14%	1,643,673	30.14%	1,652,808	30.26%	1,652,808	30.26%

* Robert Tomaszewski holds:

– directly 2,068 ordinary bearer shares, representing 0.038% of the share capital and corresponding to 2,068 votes, representing 0.038% of the total number of votes at the general meeting of Comp S.A.;

– indirectly, through CE Management Group Sp. z o.o., 273,788 ordinary bearer shares, representing 5.01% of the share capital and corresponding to 273,788 votes, representing 5.01% of the total number of votes at the general meeting of Comp S.A.

- **Robert Tomaszewski**

The Management Board of Comp S.A. announced that on 28 February 2024 the Company received a notification of the acquisition of Comp S.A. shares submitted pursuant to Article 19(1) of the MAR Regulation by a person closely associated with a person performing management duties at the Company, Mr Robert Tomaszewski, Chairman of the Management Board.

Following the acquisition by CE Management Group Sp. z o.o. of 8,000 shares in the Company on 26 February 2024, as reported by the Management Board of Comp S.A. in Current Report No. 9/2024 dated 28 February 2024, the indirect shareholding of shareholder Mr Robert Tomaszewski in the Company's share capital has changed.

These changes are described in the table below.

Entity	Number of shares prior to the share acquisition	% shareholding in the share capital prior to the share acquisition	Number of votes prior to the share acquisition	Percentage of votes in the total number of votes prior to the share acquisition	Number of shares after the share acquisition	Percentage of shares in the share capital following the share acquisition	Number of votes following the share acquisition	% of votes in the total number of votes following the share acquisition
Robert Tomaszewski*	275,856	5.05%	275,856	5.05%	283,856	5.20%	283,856	5.20%

* As at 26 February 2024, Robert Tomaszewski held:

– directly held 2,068 ordinary bearer shares, representing 0.038% of the share capital and corresponding to 2,068 votes, representing 0.038% of the total number of votes at the general meeting of Comp S.A.;

– indirectly, through CE Management Group Sp. z o.o., 281,788 ordinary bearer shares, representing 5.16% of the share capital and corresponding to 281,788 votes, representing 5.16% of the total number of votes at the general meeting of Comp S.A.

The Management Board of Comp S.A. has announced that on 18 March 2024 the Company received a notification regarding the disposal of Comp S.A. shares, submitted in accordance with Article 19(1) of the MAR Regulation by a person holding a management position within the Company, namely Mr Robert Tomaszewski, who serves as Chairman of the Management Board.

As a result of the sale of 61 shares in the Company by Robert Tomaszewski on 15 March 2024, which the Management Board of Comp S.A. reported in Current Report No. 13/2024 dated 18 March 2024, the direct shareholding of shareholder Mr Robert Tomaszewski in the Company's share capital has changed.

Details of the transaction are set out in the tables below.

Notification of a transaction involving shares in Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % of voting rights
Robert Tomaszewski*	sale of shares	15 March 2024	61	0.001%

Shareholder	Position prior to the transaction			Status after the transaction			Current report	
	Number of shares / number of votes at the AGM	% of total shares and % on the Board of Directors	% of votes at the AGM	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % on the Board of Directors	% of votes at the AGM	Report number	Date of report publication
Robert Tomaszewski*	2,068	0.038%	0.038%	2,007	0.037%	0.037%	13/2024	18 March 2024

* As at 15 March 2024, Robert Tomaszewski held:

– directly 2,007 ordinary bearer shares, representing 0.037% of the share capital and corresponding to 2,007 votes, representing 0.037% of the total number of votes at the general meeting of Comp S.A.;

– indirectly through CE Management Group Sp. z o.o.: 281,788 ordinary bearer shares, representing 5.16% of the share capital and corresponding to 281,788 votes, representing 5.16% of the total number of votes at the general meeting of Comp S.A.

Indirect and direct shareholding

Entity	Number of shares prior to the disposal	% share of shares in the share capital prior to the disposal	Number of votes prior to the share disposal	% of votes in the total number of votes prior to the share disposal	Number of shares after the disposal	Percentage of shares in the share capital after the disposal	Number of votes following the disposal of shares	% of votes in the total number of votes following the disposal of shares
Robert Tomaszewski*	283,856	5.20%	283,856	5.20%	283,795	5.20%	283,795	5.20%

* As at 15 March 2024, Robert Tomaszewski held:

– directly held 2,007 ordinary bearer shares, representing 0.037% of the share capital and corresponding to 2,007 votes, representing 0.037% of the total number of votes at the general meeting of Comp S.A.;

– indirectly, through CE Management Group Sp. z o.o., 281,788 ordinary bearer shares, representing 5.16% of the share capital and corresponding to 281,788 votes, representing 5.16% of the total number of votes at the general meeting of Comp S.A.

The Management Board of Comp S.A. has announced that on 18 March 2024 the Company received a notification of the sale of Comp S.A. shares submitted pursuant to Article 19(1) of the MAR Regulation by a person closely associated with Mr Robert Tomaszewski, the President of the Management Board, who holds a management position within the Company.

As a result of the sale of 8,259 shares in the Company by CE Management Group Sp. z o.o. on 15 March 2024, which the Management Board of Comp S.A. reported in Current Report No. 14/2024 dated 18 March 2024, the indirect shareholding of shareholder Mr Robert Tomaszewski in the Company's share capital has changed.

These changes are described in the table below.

Entity	Number of shares prior to the share acquisition	% shareholding in the share capital prior to the share acquisition	Number of votes prior to the share acquisition	% of total votes prior to the share acquisition	Number of shares following the acquisition	% share of shares in the share capital following the share acquisition	Number of votes following the share acquisition	% of votes in the total number of votes following the share acquisition
Robert Tomaszewski*	283,795	5.20%	283,795	5.20%	275,536	5.04%	275,536	5.04%

* As at 18 March 2024, Robert Tomaszewski held:

– directly held 2,007 ordinary bearer shares, representing 0.037% of the share capital and corresponding to 2,007 votes, representing 0.037% of the total number of votes at the general meeting of Comp S.A.;

– indirectly, through CE Management Group Sp. z o.o., 273,529 ordinary bearer shares, representing 5.01% of the share capital and corresponding to 273,529 votes, representing 5.01% of the total number of votes at the general meeting of Comp S.A.

The Management Board of Comp S.A. announced in Current Report No. 32/2024 on 31 July 2024 that the Company's share capital had been reduced.

Detailed information in this regard is contained in the financial statements under the section "Shareholders of Comp S.A. as at the date of publication of these financial statements, broken down by number of shares and the resulting votes" in the section concerning Comp S.A.

The reduction of the Company's share capital, and consequently the reduction in the number of shares, had a direct impact on the change in the shareholding of Mr Robert Tomaszewski, who acts as Chairman of the Management Board of Comp S.A., in his percentage shareholding in the share capital and his percentage share of votes in the total number of votes.

These changes are described in the table below.

Entity	Number of shares prior to the share redemption and reduction of the share capital	% shareholding in the share capital prior to the share redemption and share capital reduction	Number of votes prior to the share redemption and share capital reduction*	Percentage of votes out of the total number of votes prior to the share redemption and reduction of the share capital	Number of shares following the share redemption and reduction of the share capital	% share of shares in the share capital following the share redemption and reduction of the share capital	Number of votes following the share redemption and reduction of the share capital	% share of votes in the total number of votes following the share redemption and reduction of the share capital
Robert Tomaszewski*	275,536	5.04%	275,536	5.04%	275,536	6.10%	275,536	6.10%

* As at 31 July 2024, Robert Tomaszewski held:

– directly, 2,007 ordinary bearer shares, representing 0.044% of the share capital and corresponding to 2,007 votes, representing 0.044% of the total number of votes at the general meeting of Comp S.A.;

– indirectly, through CE Management Group Sp. z o.o., 273,529 ordinary bearer shares, representing 6.054% of the share capital and corresponding to 273,529 votes, representing 6.054% of the total number of votes at the general meeting of Comp S.A.

The Management Board of Comp S.A. announced that on 17 December 2024 the Company received a notification of the sale of Comp S.A. shares submitted pursuant to Article 19(1) of the MAR Regulation by a person closely associated with a person performing management duties at the Company, Mr Robert Tomaszewski, Chairman of the Management Board.

As a result of the sale of 31,598 shares in the Company by CE Management Group Sp. z o.o. on 16 December 2024, which the Management Board of Comp S.A. reported in Current Report No. 52/2024 of 17 December 2024, the indirect shareholding of Mr Robert Tomaszewski in the Company's share capital has changed.

These changes are described in the table below.

Entity	Number of shares prior to the share acquisition	Percentage of shares in the share capital prior to the share acquisition	Number of votes prior to the share acquisition	% of votes in the total number of votes prior to the share acquisition	Number of shares following the acquisition	% share of shares in the share capital after the share acquisition	Number of votes following the share acquisition	Percentage of votes in the total number of votes after the share acquisition
Robert Tomaszewski*	275,536	6.10%	275,536	6.10%	243,938	5.50%	243,938	5.50%

* As at 17 December 2024, Robert Tomaszewski held:

— directly, 2,007 ordinary bearer shares, representing 0.0444% of the share capital and corresponding to 2,007 votes, representing 0.0444% of the total number of votes at the general meeting of Comp S.A.;

— indirectly, through CE Management Group Sp. z o.o., 241,931 ordinary bearer shares, representing 5.3544% of the share capital and corresponding to 241,931 votes, representing 5.3544% of the total number of votes at the general meeting of Comp S.A.

Shareholders of Comp S.A. as at the date of publication of this report, broken down by number of shares and the resulting votes:

Shareholder	Number of shares	% of total shares	Number of votes at the General Meeting	% of votes at the AGM
Generali OFE managed by Generali PTE S.A.	805,641	17.83%	805,641	17.83%
Investment funds represented by AgioFunds TFI S.A.	701,663	15.53%	701,663	15.53%
Nationale-Nederlanden OFE managed by Nationale-Nederlanden PTE S.A.	443,810	9.82%	443,810	9.82%
Perea Capital Partners, LP	302,480	6.69%	302,480	6.69%
PKO Bankowy OFE and PKO DFE managed by PKO BP Bankowy PTE S.A.	225,237	4.98%	225,237	4.98%
Robert Tomaszewski*	236,008	5.22%	236,008	5.22%
Comp S.A.	417,245	9.23%	417,245	9.23%
Other shareholders	1,386,235	30.68%	1,386,235	30.68%
Total	4,518,319	100.00%	4,518,319	100.00%

*Robert Tomaszewski holds:

— directly, 2,007 ordinary bearer shares, representing 0.0444% of the share capital and corresponding to 2,007 votes, representing 0.0444% of the total number of votes at the general meeting of Comp S.A.;

— indirectly, through CE Management Group Sp. z o.o., 241,931 ordinary bearer shares, representing 5.3544% of the share capital and corresponding to 241,931 votes, representing 5.3544% of the total number of votes at the general meeting of Comp S.A.; Status following the buyback by Comp S.A. of 148,245 own shares, representing 3.28% of the total number of shares.

In the period from the end of the reporting period (i.e. from 31 December 2024) to the date of publication of this report, the following changes occurred in the shareholdings of entities holding, directly or indirectly through subsidiaries, more than 5% at the General Meeting of Shareholders of Comp S.A.

- **Comp S.A.**

The Management Board of Comp S.A. has announced that, pursuant to Article 362(1)(5) and (8) of the Commercial Companies Code and Resolution No. 23/2024 of the Company's Ordinary General Meeting of 27 June 2024 on authorising the Company's Management Board to acquire treasury shares (hereinafter the "Resolution"), in pursuance of the "Invitation to submit offers to sell shares in Comp S.A." announced on 18 February 2025, as disclosed in Current Report No. 4/2025 of 18 February 2025, the Company has acquired 120,000 shares. The shares in question represent 2.66% of the share capital and confer 120,000 votes at the Company's general meeting, which constitutes 2.66% of the total number of votes at the Company's general meeting.

Prior to the transaction, the Company held 297,245 shares, which represented 6.58% of the share capital and conferred 297,245 votes at the Company's general meeting, representing 6.58% of the total number of votes at the Company's general meeting.

Following the transaction, the Company holds 417,245 shares, representing 9.23% of the share capital and conferring 417,245 votes at the Company's general meeting, which constitutes 9.23% of the total number of votes at the Company's general meeting.

No voting rights are exercised at the Company's general meeting in respect of treasury shares held by the Company and its subsidiaries. Pursuant to § 2(9) of the Resolution, treasury shares acquired by the Company may be cancelled on the basis of a separate resolution of the general meeting.

The Company did not notify the Polish Financial Supervision Authority as the thresholds referred to in Article 69(1) and (2) of the Act of 29 July 2005 on Public Offerings and the Conditions for Introducing Financial Instruments to Organised Trading and on Public Companies (i.e. Journal of Laws of 2024, item 620, as amended).

The Management Board of Comp S.A. reported the above change in Current Report No. 5/2025 of 7 March 2025.

Details of the transactions carried out are presented in the tables below.

Notification of transactions in the shares of Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares / number of votes at the AGM	% of total shares and % in the Board of Directors
Comp S.A.	acquisition of shares	7 March 2025	120,000	2.66%

Entity	Number of shares prior to the share acquisition own	% of shares in the share capital prior to the share buyback	Number of votes prior to the share buyback	% of votes in the total number of votes prior to the share buyback	Number of shares after the share buyback	Percentage of shares in the share capital following the share buyback	Number of votes following the share buyback	% of votes in the total number of votes following the share buyback
Comp S.A.	297,245	6.58%	297,245	6.58%	417,245	9.24%	417,245	9.24%

- **Other shareholders of Comp S.A.**

Pursuant to Article 69 of the Act of 29 July 2005 on Public Offerings and the Conditions for Introducing Financial Instruments to Organised Trading and on Public Companies, Nationale-Nederlanden Powszechno Towarzystwo Emerytalne S.A., the manager of the Nationale-Nederlanden Open Pension Fund, has informed the Management Board of Comp S.A. that, following the response to the invitation to sell shares dated 18 February 2025 announced by the Company (as reported by the Company in Current Report No. 4/2025 of 18 February 2025), on 7 March 2025, Nationale-Nederlanden Open Pension Fund reduced its holding of the Company's shares to below the threshold of 10% of the total number of votes in the Company.

The Management Board of Comp S.A. announced the above change in Current Report No. 7/2025 dated 12 March 2025.

Details of the changes are set out in the table below:

Entity	Number of shares prior to the disposal	% share of shares in the company's share capital prior to the disposal	Number of votes prior to the share disposal	% of total votes prior to the share disposal	Number of shares after the disposal	Percentage of shares in the share capital following the disposal of shares	Number of votes following the disposal of shares	% of votes in the total number of votes following the disposal of shares
Nationale-Nederlanden Open Pension Fund managed by Nationale-Nederlanden Powszechnie Towarzystwo Emerytalne S.A.	458,848	10.16%	458,848	10.16%	443,810	9.82%	443,810	9.82%

Pursuant to Article 69 of the Act of 29 July 2005 on Public Offerings and the Conditions for Introducing Financial Instruments to Organised Trading and on Public Companies, PKO BP Bankowy Powszechnie Towarzystwo Emerytalne S.A., the manager of the PKO BP Bankowy Open-Ended Pension Fund and the PKO Voluntary Pension Fund, has informed the Management Board of Comp S.A. that as a result of:

- a) Following the settlement on 27 March 2025 of the sale of 922 shares in the Company on the public market by PKO BP Bankowy Otwarty Fundusz Emerytalny, PKO BP Bankowy Otwarty Fundusz Emerytalny's shareholding fell below 5% of the total number of votes in the Company.
- b) settlement on 28 March 2025 of a transaction concluded by: (i) PKO BP Bankowy Otwarty Fundusz Emerytalny on the public market for the sale of 3,374 shares in the Company and (ii) PKO Dobrowolny Fundusz Emerytalny on the public market of the sale of 100 shares in the Company, the combined shareholding of these funds has fallen below 5% of the total number of votes in the Company.

The Management Board of Comp S.A. reported the above changes in Current Report No. 9/2025 dated 2 April 2025. Details of the changes are set out in the table below:

Notification of a transaction involving shares in Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of the total number of shares and % in the Shareholder Register
PKO BP Bank Open Pension Fund	sale of shares	27 March 2025	922	0.03%

Notification of a transaction involving shares in Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of the total number of shares and % in the Shareholder Register
PKO BP Bankowy Open Pension Fund	sale of shares	28 March 2025	3,374	0.07%

Notification of a transaction involving shares in Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of the total number of shares and % in the Shareholders' Register
PKO Voluntary Pension Fund	sale of shares	28 March 2025	100	0.002%

Entity	Number of shares prior to the disposal	Percentage of shares in the share capital prior to the disposal	Number of votes prior to the disposal of shares	Percentage of votes in the total number of votes prior to the share disposal	Number of shares after the disposal	Percentage of shares in the share capital after the disposal	Number of votes following the disposal of shares	Percentage of votes in the total number of votes after the disposal of shares
Total share of funds managed by PKO BP Bankowy Powszechnie Towarzystwo Emerytalne S.A.	229,633	5.08%	229,633	5.08%	225,237	4.98%	225,237	4.98%
PKO BP Bank Open Pension Fund	226,833	5.02%	226,833	5.02%	222,537	4.92%	222,537	4.92%
PKO Voluntary Pension Fund	2,800	0.06%	2,800	0.06%	2,700	0.06%	2,700	0.06%

- Robert Tomaszewski**

The Management Board of Comp S.A. announced that on 7 March 2025 the Company received a notification of the sale of Comp S.A. shares submitted pursuant to Article 19(1) of the MAR Regulation by a person closely associated with a person performing management duties at the Company, Mr Robert Tomaszewski, Chairman of the Management Board.

As a result of the sale of 7,930 shares in the Company by CE Management Group Sp. z o.o. on 7 March 2025, as reported by the Management Board of Comp S.A. in Current Report No. 6/2025 dated 7 March 2025, the indirect shareholding of shareholder Mr Robert Tomaszewski in the Company's share capital has changed.

These changes are described in the table below.

Notice of a transaction involving shares in Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % in the Shareholders' Register
CE Management Sp. z o.o.*	sale of shares	07/03/2025	7,930	0.176%

Shareholder	Position prior to the transaction			Status after the transaction			Current report	
	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % of voting rights	% of votes at the AGM	Number of shares (units) / number of votes at the AGM (units)	% of the total number of shares and % of the Board of Directors	% of votes at the AGM	Report number	Date of report publication
Robert Tomaszewski*	243,938	5.40%	5.40%	236,008	5.22%	5.22%	6/2025	7 March 2025

* Robert Tomaszewski holds:

– directly 2,007 ordinary bearer shares, representing 0.037% of the share capital and corresponding to 2,007 votes, representing 0.037% of the total number of votes at the general meeting of Comp S.A.;

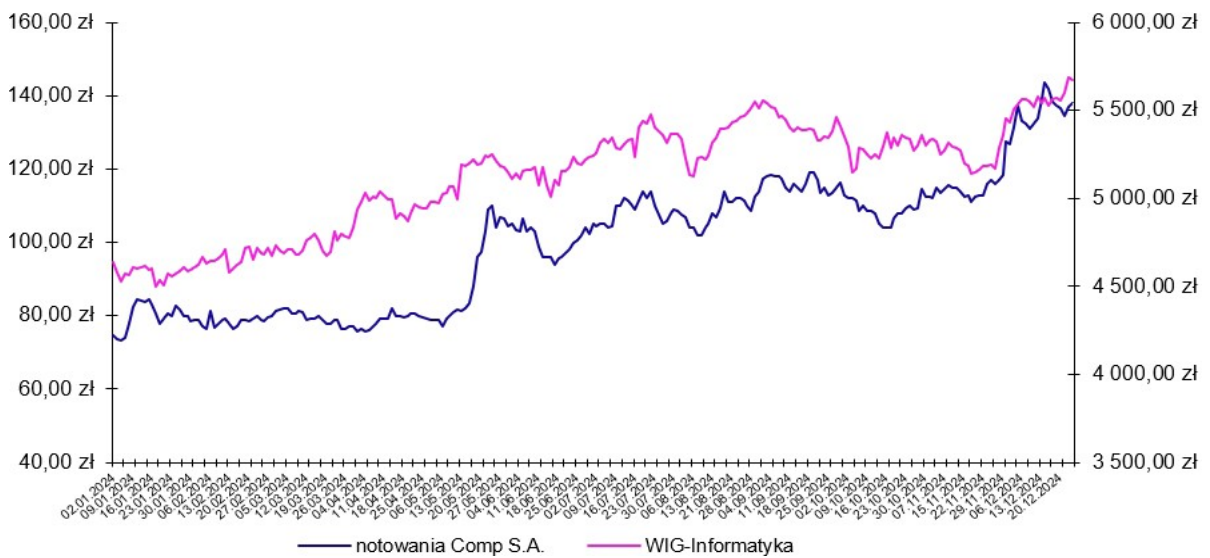
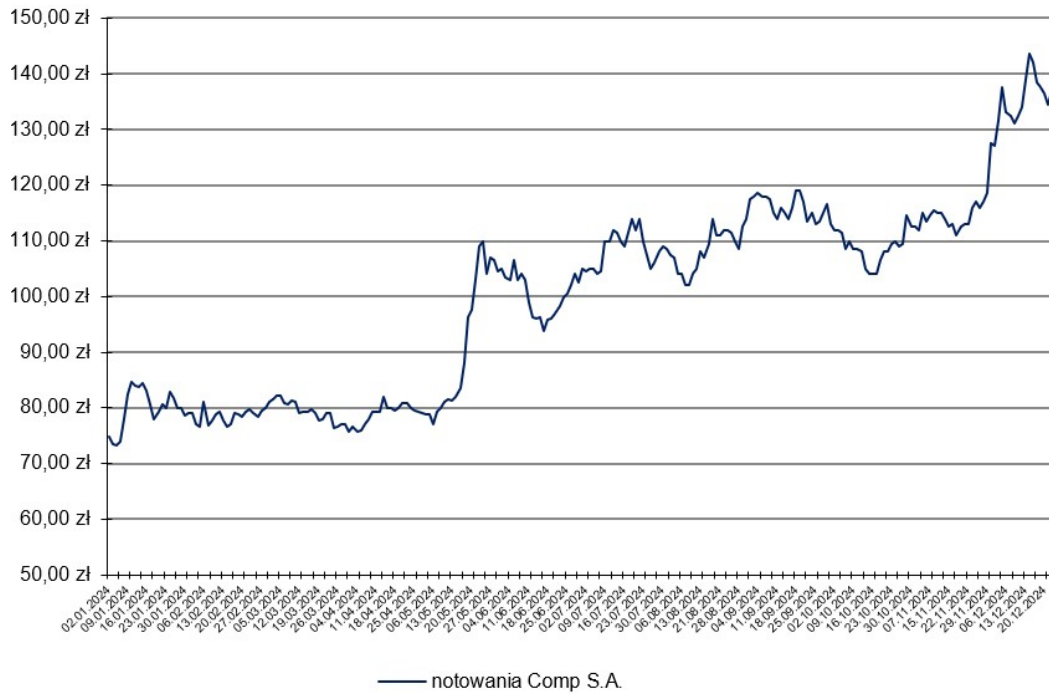
– indirectly, through CE Management Group Sp. z o.o., 234,001 ordinary bearer shares, representing 5.18% of the share capital and corresponding to 234,001 votes, representing 5.18% of the total number of votes at the general meeting of Comp S.A.

The Company's Management Board's knowledge of changes that have occurred since the submission of the last interim report is based on:

- information on the structure of their own assets published by open pension funds in their annual reports, as well as information obtained by the Company directly from universal pension funds,
- the attendance list of shareholders entitled to participate in the last general meeting of the Company prior to the date of publication of this report,
- direct information from shareholders who have experienced changes in the number of Company shares held, and information received from persons holding management positions and persons closely associated with them regarding any transactions carried out by such persons in relation to the Company's shares.

COMP S.A. SHARE PRICES

The share prices of the Company in 2024 are shown in the chart below:



INVESTMENTS IN SHARES AND STOCKS											
SHARES OR STOCKS IN ENTITIES DIRECTLY SUBSIDIARY TO COMP S.A.											
as at 31 December 2024											
No.	a	b	c	d	e	f	g	h	i	j	k
	<i>name (company name) of the entity, specifying its legal form</i>	<i>registered office</i>	<i>business activity</i>	<i>nature of the relationship (subsidiary, jointly controlled entity, associated company)</i>	<i>consolidation method used</i>	<i>date of acquisition of control / joint control / significant influence</i>	<i>value of shares at acquisition cost</i>	<i>revaluation adjustments</i>	<i>carrying amount per share</i>	<i>percentage of share capital held</i>	<i>proportion of the total number of votes at the general meeting</i>
1	Enigma Information Security Systems Ltd	116 Jutrzenki Street 02-230 Warsaw	Software development and manufacture of cryptographic devices	subsidiary subsidiary	full	15 June 2005	99,254	-	99,254	100.00	1
2	Comp Platform Services S.A.	116 Jutrzenki Street 02-230 Warsaw	IT consultancy services, wholesale of computers, software-related activities	subsidiary wholly-owned	full	03/12/2018	11,204	-	11,204	50.46	2
3	Insoft Sp. z o.o.	3A Jasna Street 31-227 Kraków	Development and implementation of software supporting commercial activities	subsidiary subsidiary	full	14 April 2011	2,955	-	2,955	52.00	3
4	N o n Stop SOC Ltd.	116 Jutrzenki Street 02-230 Warsaw	IT consultancy services	subsidiary subsidiary	full	30 August 2024	5	-	5	100.00	4
5	Micra Metripond KFT PLN	6800 Hódmezővásárhely, Bajcsy-Zsilinszky E. u 70. Pf.:140 Hungary	Manufacture and sale of calculating scales, labelling scales, electronic scales and cold meat slicers; provision of maintenance services for the products sold	subsidiary subsidiary	wholly	18 April 2011	7,841	-	7,841	96.35	5
6	Elzab Hellas SPV Sp. z o.o.	1 Elzab Street 41-813 Zabrze	Supply of fiscal and non-fiscal devices to the Greek market	subsidiary subsidiary	full	29 July 2016	10,028	(10,028)	-	90.03	6
Total:							131,287	(10,028)	121,259		

**SHARES OR STOCKS IN COMP S.A. SUBSIDIARIES SELECTED FINANCIAL DATA
OF COMPANIES**

No	a	b						c			d			e	f	g
	name of the entity	the entity's equity						liabilities and provisions for liabilities of the entity			the entity's receivables			total assets of the entity	sales revenue	dividends received or due from the entity for the last financial year
		share capital	capital reserve	other equity, including:			- long-term liabilities	- current liabilities		- long-term receivables	- short-term receivables					
				retained earnings (losses)	net profit (loss)											
1	Enigma Information Security Systems Ltd.	156,141	30,798	92,622	32,721	-	32,721	314,326	95,262	219,064	38,865	4,951	33,914	470,467	379,135	35,000
2	Comp Platform Services Ltd	1,981	22,204	-	(20,223)	(21,079)	856	6,479	32	6,447	1,447	-	1,447	8,460	8,818	-
3	Insoft Ltd	7,972	50	6,045	1,877	-	1,877	1,886	1,052	834	1,360	-	1,360	9,858	10,806	616
4	NonStop SOC Ltd	15	5	-	10	-	10	112	51	61	-	-	-	127	150	-
5	Micra Metripond KFT (converted to PLN)	7,455	2,662	-	4,793	6,085	289	1,823	4	1,819	495	-	495	9,278	10,618	-
6	Elzab Hellas SPV Sp. z o.o.	(1,451)	17	10,012	(11,480)	(6,316)	(5,164)	2,633	208	2,425	74	-	74	1,182	60	-
7	Elzab Hellas AE (converted to PLN)	(7,949)	107	-	(8,056)	(7,909)	(147)	9,456	-	9,456	257	-	257	1,507	4,790	-

2. Events having a material impact on the Issuer's operations that occurred during the financial year, as well as after its end, up to the date of approval of the financial statements.

Significant agreements

On 2 September 2024, the Management Board of Comp S.A. received information from its subsidiary, Enigma SOI Sp. z o.o., regarding the conclusion of a contract for transportable nodes for ICT systems with an entity acting as a representative of the State Treasury.

The gross value of the agreement in its basic scope is PLN 53,845,974.45, with the agreement additionally providing for the possibility of carrying out additional work with a maximum gross value of PLN 37,670,344.08.

The contract in question, in its basic scope, is to be performed within 99 to 180 calendar days from the date of conclusion of the contract. The option may be exercised within 12 months of the date of conclusion of the contract, in which case it is to be performed within 240 calendar days of the date of delivery of the notice of exercise of the option.

The remaining terms of the agreement do not differ from those typically applied to agreements of this kind.

On 3 September 2024, the Company entered into a guarantee agreement with TD SYNEX Poland Sp. z o.o., with its registered office in Warsaw, in respect of the liabilities of its subsidiary, namely Enigma SOI Sp. z o.o., with its registered office in Warsaw, up to the amount of PLN 67,000,000.00, plus any interest and costs. The guarantee is valid until 31 August 2025 in respect of liabilities arising from 2 September 2024 to 28 February 2025. Under the agreement, the Company will be jointly and severally liable for the liabilities of Enigma SOI Sp. z o.o. arising from commercial orders placed during the aforementioned period and fulfilled for the benefit of Enigma SOI Sp. z o.o.'s customers in connection with contracts performed on their behalf, including, inter alia, the contracts referred to in current reports No. 36/2022 of 29 November 2022 and No. 39/2024 of 2 September 2024.

The remaining terms of the agreement do not differ from those typically applied to agreements of this kind.

After the balance sheet date, on 21 February 2025, TD SYNEX Poland Sp. z o.o. issued a statement that, as of 21 February 2025, it was releasing the legal security for the repayment of the debt in the form of a civil guarantee provided by Comp S.A. in favour of Enigma Systemy Ochrony Informacji Sp. z o.o.

Projects based on the SaaS (Software as a Service) model in cooperation with the Eurocash Group

From 2024, the Comp Group has been selling value-added services under the SaaS model relating to the organisation of promotions and data management under a new model, in which the Comp S.A. Capital Group becomes a technology partner to market leaders (the Eurocash Group).

Update to the Capital Group's development strategy

On 12 May 2022, 29 July 2022, 15 September 2022, 29 September 2023, 25 October 2023, 15 December 2023, 9 January 2024, 6 February 2024, 5 June 2024, 26 November 2024, 7 January 2025, 21 January 2025 and 26 March 2025. The Company has published announcements regarding the Capital Group's strategy.

The content of the announcements is provided below.

Announcement of 12 May 2022: "Guidelines for the 'COMP NEXT GENERATION' strategy for 2022 to 2025"

"The Management Board of COMP S.A., in conjunction with the Supervisory Board's Strategy Committee, has drawn up strategic objectives that serve as a guide for activities in 2022 and for the Company's and the Group's future plans up to and including 2025. The driving force behind these plans is to achieve the best financial position in the Company's history. The 'COMP 2025 Next Generation' strategy will cover all the Group's main areas of operation and will enable the Group to reduce its dependence on the fiscal cycles of its existing business."

The company recognised and capitalised on the window of opportunity presented by the transition to online tax filing. This enabled a significant reduction in debt levels (from 3.5x EBITDA in 2019 to 1x EBITDA in 2021) and the payment in August 2021 of a dividend of approximately PLN 3, i.e. a dividend yield of 5%. This illustrates the Comp Group's ability to react swiftly to changing market conditions and its capacity to maximise its potential. This

ability will be key to achieving our objectives in the coming years through the identification of new market trends. The foundation of the “Comp 2025 Next Generation” Strategy is the optimal utilisation of our resources and expertise in the context of the rapid and significant changes currently taking place in Poland, Europe and globally.

The Retail Division is ideally positioned for long-term growth, particularly in the areas of value-added services and subscription-based sales. The market trend the Company intends to capitalise on is the rapid growth of sales based on the multichannel and omnichannel models. Our goal for the coming years is to transform the cash register into a multifunctional device in line with this trend, offering a range of additional paid and independently offered services (VAS or SAAS model), including infrastructure for cashless payments. This task can be achieved thanks to our leading position in the Polish online device market. The scale of our production and market presence allows us to gain a competitive advantage, at a time when smaller companies may be more severely affected by supply chain disruptions linked to global events and the lack of a pre-installed base of devices on which to provide value-added services. Alongside the development of value-added services, a priority – particularly for 2022 – is to strengthen production in Poland and optimise the costs of this activity.

Given the consequences of the war in Ukraine, our proven expertise in the IT sector – and in particular our subsidiary Enigma SOI Sp. z o.o., which operates as a separate business unit providing specialised/military cybersecurity solutions – stands to see a significant increase in its value.

In our strategic assumptions, we do not foresee any significant expansion of our integration activities outside Poland. Integration will remain focused on the Polish market and the execution of increasingly long-term, fixed-term contracts and maintenance services in Poland. The assumed IT export objective, however, is to establish a market position that is financially significant for the Company, based on the significant product solutions already in place (SDE, identification tools).

The M/platform project will achieve a turnover of several million zlotys this year based on secured contracts, representing over 75% growth in revenue compared to 2021 from commissions received from manufacturers for organising promotions (M/promo+) and from the sale of aggregated data (M/analytics). Our scale and responsiveness enable us to continue growing by capitalising on the ongoing digitalisation of the retail sector. One-stop-shop retail chains are developing dynamically, expanding their scope to include services, automating sales and making extensive use of e-commerce tools. This is not just a Polish trend. The functional scope of the M/platform, which comprises advanced applications and services, is exactly what modern shops need, including these rapidly developing modern retail chains. The company will also explore export potential, taking into account the system’s exceptional functional scope and sophisticated technology for processing millions of transactions daily in real time under a SaaS model, whilst maintaining security and confidentiality at a level comparable to that of banks.

The companies within the Comp Group have developed and possess the capability to offer products and solutions in highly regulated sectors, which require the acquisition of relevant certifications and cooperation with government authorities.

In this field, we are seeing the attractive trends described above in cybersecurity and the transition to a cashless economy.

The production of electric vehicle chargers, based on our existing technological resources, may also fit into this development strategy. This is a key element and the infrastructural foundation of the rapidly expanding electromobility sector. By the end of the year, the Company will assess the quality of its competitive advantages in this market. This is a very ambitious goal, but we believe that by 2025, the Comp Group can play a significant role in the Polish market and contribute to the broader process of reindustrialisation in Europe.

The above assumptions set out the general direction of the Company’s development. By the end of this quarter, they will be detailed with the financial targets and indicators we intend to achieve by 2025.”

Announcement of 29 July 2022 “Strategy for the Comp Capital Group entitled ‘COMP 2025 Next Generation’ for the years 2022–2025”

“The Management Board of COMP S.A., in cooperation with the Strategy Committee of the Supervisory Board, has developed a new strategy for the Group, entitled ‘COMP 2025 Next Generation’. The priority objective of ‘COMP 2025 NEXT GENERATION’ is

to ensure steady growth in the Company's value, independent of the pace of fiscalisation. The adopted strategy envisages the Company entering this stable growth trajectory as early as the beginning of 2023.

In a period of heightened external uncertainty, COMP is increasing the predictability of its own operations. This is due to increased contracting in growing sectors such as cybersecurity, value-added services and new technologies for shops, retail chains and service outlets. COMP is making increasing use of its clients' multi-year budgets. This represents a new level of quality, providing a basis for more confident planning for the future. Another new development is the significant expected conversion of revenue growth into EBITDA growth.

The cornerstone of "COMP 2025 Next Generation" is the growth of sales of multifunction devices and M/platforms under a subscription model, as well as securing long-term IT contracts. Complementing the Company's focus on this key area for the future of its business will be an increase in the organisational efficiency of the entire Comp Group.

The key elements of the strategy to be implemented in 2022 are:

1. Signing contracts guaranteeing long-term revenue, covering at least 2023 in the IT sector.
2. Confirmation of the use of M/platforms by further major market players (retail chains, manufacturers).
3. Entry into the car wash market and acquisition of further passenger transport corporations as clients – virtual cash register technology on a subscription basis.
4. Achieving the technological readiness and approvals necessary to convert all previously sold and all new online cash registers into multifunctional devices – with additional payment functions and e-receipts.
5. Implementing restructuring measures in the electronics manufacturing sector, including reducing non-fiscal production and cutting fixed costs across the entire group.

The benefits of the strategic measures currently being implemented will be clearly reflected in the results in the coming years. 2022 is a transitional year, in which the Company plans to achieve an EBITDA profit of approximately PLN 70–75 million, but the projected EBITDA profit for 2023 is expected to reach approximately PLN 95–100 million. Plans for 2024–2025 are being drawn up and envisage further growth in EBITDA of around 20% per annum.

The Company expects a very high volume of contracts for the current year and subsequent years, which will result in increased demand for working capital. The contracts cover and will continue to cover the company's own products and solutions, as well as third-party products. The company has secured debt financing to meet the increased order intake this year. Net financial debt will reach 1.0–1.5 times EBITDA by the end of 2023, and this will be the target level throughout the strategy implementation period.

The fundamental objective of "COMP 2025 Next Generation" is to achieve growth resilient to changing fiscal regulations and to enhance financial security whilst maintaining a high level of profit distribution to shareholders. The forecasts and targets adopted are conservative, based on existing products and the current offering. At the same time, we see opportunities related to the growing synergy between payment and fiscal systems in Poland. Furthermore, we are considering a broader entry into the electromobility market as a manufacturer of car chargers, a market subject to regulatory changes across Europe. These are examples of issues covered by the strategic analysis under 'COMP 2025 Next Generation', but not included in the forecasts presented.

During the course of the strategy, measures are planned to streamline assets that are not priorities for the strategic development of the business. As a result, opportunities for capital transactions may arise. COMP is keeping its options open regarding strategic and capital alliances in every area of its operations. These measures will be guided by the adopted COMP Next Generation strategy. Our primary priority for COMP Next Generation is to sustainably increase the value of COMP regardless of external cycles."

Press release dated 15 September 2022: "COMP 2025 Next Generation Strategy – achieving the M/platform target for the current year and sustainable profitability of the M/platform project from 2023"

"COMP S.A., based in Warsaw (hereinafter "the Company"), has today received confirmation that further major market players are adopting M/platform technology, which was M/platform's primary objective for this year as set out in its announced strategy. As a result, the Company plans to achieve sustainable profitability and a positive

contribution from the M/platform project to the Comp S.A. group's EBITDA from 2023 onwards. This marks a turning point in the project's development to date.

Business agreements concluded to promote M/platform technology, including within retail chains, are resulting in a significant increase in contracts for M/platform ecosystem services provided by the Comp S.A. group from 2023 onwards. The increase in sales will relate to SAAS services sold on a subscription basis under multi-year contracts, which is one of the main sources of growth described in the COMP 2025 Next Generation strategy.

This is consistent with the information we have previously provided, namely that our scale and responsiveness allow us to further grow the M/platform project by leveraging the ongoing networking of the grocery retail sector. This trend is evident not only in Poland and applies not only to the grocery retail sector; therefore, in subsequent stages, once profitability in the Polish grocery market has been secured, we will focus on developing export prospects in the FMCG market and other sectors in Poland, utilising our technological potential and the Polish grocery market as the first reference market for effective large-scale implementation. In our plans, we will focus on developing those elements of the M/platform ecosystem that will ensure adequate profitability during the strategy's implementation period.

The growth in contracts for M/platform-based services brings us closer to achieving the priority objective of "COMP 2025 NEXT GENERATION", which is to ensure sustained growth in the Company's value, independent of the pace of fiscalisation. The adopted strategy envisages the Company entering this stable growth trajectory as early as the beginning of 2023."

Press release of 29 September 2023 "Update on the COMP 2025 Next Generation strategy and information regarding the dividend policy"

"The Management Board of Comp S.A., with its registered office in Warsaw ("COMP" or "the Company"), notes that the merger with Zakłady Urządzeń Komputerowych "ELZAB" S.A., with its registered office in Zabrze (hereinafter "ELZAB"), represents the next stage in the implementation of the COMP 2025 Next Generation strategy. The results for the first half of the year and the forecasts for the coming periods for the COMP Group confirm the effectiveness of the strategy being implemented. Our assumptions and strategic objectives remain unchanged. We are confident that we will achieve the financial targets set out in the COMP 2025 Next Generation strategy.

The growth in results is linked to increased sales of cybersecurity services and products, as well as an expansion in the scale of subscription-based service sales to networks and small and medium-sized enterprises.

The implementation of the strategy to improve the Group's operational efficiency is also already yielding visible results. Thanks to the restructuring of production in 2022, we are saving at least PLN 10 million in cash this year. Compared to other large IT companies, our revenue per full-time equivalent remains at a very high level, even when including B2B remuneration. The next step in achieving cost savings, equally important as the restructuring of production, is the planned merger of COMP with its subsidiary ELZAB. Details of this plan, along with the benefits and parameters, were disclosed to the public in a previous current report.

Improved efficiency resulting from structural savings and increased operating cash flow thanks to better EBIT/EBITDA performance, as well as other favourable factors, will enable a further increase in the distribution to shareholders in 2024. The Management Board's plan envisages a payout of at least PLN 7.5 per share in 2024, compared to PLN 6.5 per share planned for the whole of 2023. The distribution will be effected by utilising the authorisation granted by the Company's General Meeting to buy back own shares until the end of 2024, whilst maintaining a safe level of debt. The Company's net debt level is no longer strategically significant thanks to the favourable debt-to-EBITDA ratio achieved this year. An increase in net debt is possible during periods of higher business activity.

The merger with ELZAB will enable the optimisation of the international sales model at the COMP level and the acquisition of potential partners where it will not be possible to achieve the set targets independently. We will also review product lines related to subsidiaries in Poland to further optimise our operations.

The key objective of the COMP 2025 Next Generation strategy is to achieve growth and financial security independent of regulatory changes resulting in the mandatory fiscalisation of new tax groups. The Company's plan

is to generate recurring revenue from additional services on fiscal devices and from subscription-based device sales, which will signify a full transition towards multifunctional devices.”

Press release of 25 October 2023 “Raising the financial targets for 2023 set out in the COMP 2025 Next Generation strategy”

“The Management Board of Comp S.A., with its registered office in Warsaw (“the Company”), confirms that the growth in EBITDA and the increase in returns to shareholders are the main financial targets of the COMP 2025 Next Generation strategy.

The company is raising its estimated EBITDA for 2023 to approximately PLN 100–105 million (from a minimum of PLN 95 million). The numerical financial targets for the coming years remain unchanged (estimated EBITDA: approximately PLN 115 million in 2024 and approximately PLN 135 million in 2025).

The revision of the previously announced forecasts for 2023 is driven by a number of decisions favourable to the group in the areas of digitalisation and cybersecurity, with implementation scheduled for later this year. At the same time, we are taking into account the anticipated one-off write-downs and provisions related to the planned rationalisation of all product lines in the Retail sector, as announced in the strategy update contained in Current Report No. 34/2023 of 29 September 2023.

The Company confirms its strong cash generation as a result of strategic actions, including a focus on the right areas of development and the investments and expenditure incurred for this purpose in previous years. Consequently, the payout to shareholders is increasing, with the value per share set to more than double next year from the start of the implementation of the COMP 2025 Next Generation strategy: PLN 3.5 per share paid out in 2022, PLN 6.5 this year and a minimum of PLN 7.5 planned for next year.

The Management Board of Comp S.A. notes that the term “estimated EBITDA” at consolidated level, as presented in this current report, is not defined in the applicable accounting standards and may constitute an Alternative Performance Measure within the meaning of ESMA Guidelines 2015/1415, the definition of which the Company included in current report No. 3/2022 dated 31 March 2022.”

Announcement of 15 December 2023 “Update of the parameters of the COMP 2025 Next Generation strategy”

“The Management Board of Comp S.A., with its registered office in Warsaw (“the Company”), announces an update to the parameters of the COMP 2025 Next Generation strategy, which entails an increase in the estimated EBITDA for 2023, a planned increase in the cash position, and announces a change to the sales model for value-added services on multifunctional fiscal devices implemented as part of the M/platform solution and related optimisation measures within the capital group.

Based on a review of product lines and market analysis, as reported in Current Report No. 34/2023 of 29 September 2023, and on the conclusion of an agreement with the Eurocash Group on 14 December 2023

The Company’s Management Board has decided to further develop value-added services based on M/platform technology exclusively in close cooperation with strategic partners who are leaders in their respective market segments and possess their own distribution centres and well-established retail networks.

This move represents the implementation of the COMP 2025 Next Generation strategy, as outlined in Current Report No. 29/2022 of 29 July 2022 concerning the sale of services on multifunctional devices, with a view to making greater use of customers’ multi-year budgets and achieving a high conversion of revenue growth into EBITDA growth. In Poland, the Eurocash Group is the leading FMCG player in the largest retail market segment, and together with them we will continue to intensively develop our value-added services related to promotions and transaction data processed on fiscal devices, further expanding their scope to include payment infrastructure and e-receipts, the importance of which in our total subscription revenue will grow significantly in the coming years. The model has been proven, and the recent agreement with the Eurocash Group marks the next stage in strengthening our business relationship, building on the highly beneficial experiences for both companies in 2023.

Recently, we have been implementing two models simultaneously – and the model of strategic cooperation with market leaders has proved more effective, which has contributed to an improvement in our margin and cash flows from the sale of promotional organisation and data transmission services, whilst minimising operational risk and optimising

working capital commitment. In the future, given the strong trend towards the expansion of retail chains, including franchise networks, this model will not only be more effective – it will become virtually the only viable option. The change in model means higher and more profitable sales of subscription services. Contracts for all subscription services related to multifunctional devices for the next four years (2024–2027) have increased by approximately 50% since the start of the year, reaching revenue of over PLN 90 million.

As a consequence of introducing a strategic cooperation model with market leaders, operations based on the previous model are being discontinued. This effectively means ceasing operations in foreign markets regarding the M/platform project, which previously developed value-added services on fiscal devices, and discontinuing the development of M/store – a segment of value-added services intended primarily for distributors, manufacturers and independent retailers. Discontinuing operations in an unpromising and less effective area means implementing the COMP 2025 Next Generation strategy in terms of optimising assets that are no longer priorities for strategic development.

The change in the sales model for value-added services will have a positive impact on the EBITDA ratio, as well as on cash flow and operating ratios. The accounting impact on net profit is preliminarily estimated at approximately PLN 69 million in write-downs reducing its value in 2023, which means a partial reduction in retained earnings (at the end of the third quarter of 2023, this stood at over PLN 262 million). The dominant component of this will be the write-down of the goodwill of JNJ Ltd., which is not amortised in accordance with IAS 38, as the company's business involving the direct development of value-added services will be discontinued. The book value being written down arose at the time of the company's acquisition in 2014.

The above accounting treatment does not affect the amount of the distribution to shareholders for the years 2023 to 2025 (as was the case with the net loss for 2022). The distribution to shareholders will continue to grow as planned to a minimum of PLN 7.5 per share next year due to the Company's very strong cash position, retained earnings from previous years and the authorisation to buy back its own shares.

The Management Board emphasises that, despite the one-off write-down of discontinued operations, all the above decisions are in line with the COMP 2025 Next Generation strategy and have a positive impact – starting this year – on operating metrics and cash flows. The model of strategic cooperation with a market partner in this area will limit our investments and the risks associated with building our own position, thereby strengthening our plans to achieve our objectives, including, above all, growing EBITDA and transfer levels by the end of the COMP 2025 Next Generation strategy.

We are raising our forecast for the reported estimated EBITDA for this year to approximately PLN 110 million and confirming our plans to achieve the target debt level, reducing the maximum debt-to-EBITDA ratio to approximately 1.35x by the end of this year – which implies a plan to generate approximately PLN 40 million in cash in the current quarter alone. These funds will be used to reduce net financial debt by approximately PLN 30 million and to pay out over PLN 11 million in the share buyback programme currently coming to an end.

The Company thus confirms that it has achieved, and even exceeded, all the targets of the COMP 2025 Next Generation strategy set for 2022–2023, whilst simultaneously laying the foundations for further growth.

The Management Board of Comp S.A. notes that the term “estimated EBITDA” at the consolidated level, as presented in this current report, is not defined in applicable accounting standards and may constitute an alternative performance measure (APM) within the meaning of ESMA Guidelines 2015/1415, the definition of which the Company included in Current Report No. 3/2022 of 31 March 2022.”

Announcement of 9 January 2024 “Reduction in net financial debt under the COMP 2025 Next Generation strategy”

“The Management Board of Comp S.A., with its registered office in Warsaw (“the Company”), announces a change to the forecast for net financial debt at the end of 2023 and 2024.

We would like to inform you that the net financial debt ratio is expected to fall to approximately 0.5 times EBITDA as at 31 December 2023 in the consolidated financial statements of the COMP Group. The forecast level of net financial debt, which is significantly lower than that stated in Current Report No. 43/2023 of 15 December 2023, is a consequence of favourable and difficult-to-predict contract settlements in the IT segment, in the form of early payments by public sector clients made at the end of the year. As at 31 December 2023, these factors reduced the ratio in question; however, taking into account all

contract settlements associated with them, the net financial debt ratio at the end of 2023 would stand at below 1.35x EBITDA.

In the long term, the greatest impact on achieving and maintaining a lower level of debt, in line with the guidelines of the COMP 2025 Next Generation strategy, comes from an increase in sales value and the profitability of services in the subscription model, as well as a change in the sales model for value-added services, as announced by the Company in Current Report No. 43/2023 of 15 December 2023.

We confirm the effective and stable implementation of these strategic objectives and, consequently, are lowering our estimated forecast for the net financial debt ratio to a range of approximately 0.5 to approximately 1.1 x EBITDA at the end of 2024.

At the same time, we confirm our previously announced plans to distribute a minimum of PLN 7.5 per share (approximately PLN 33.9 million) to shareholders in 2024 via a general share buy-back. The first tranche of this distribution (amounting to approximately PLN 14 million) will be carried out in the first half of 2024.

The Company's Management Board notes that the terms "EBITDA" and "net financial debt" at consolidated level, as presented in this current report, are not defined in applicable accounting standards and may constitute alternative performance measures (APMs) within the meaning of the ESMA/2015/1415, the definitions of which the Company included in Current Report No. 3/2022 of 31 March 2022."

Announcement of 6 February 2024 "Information on the value of the planned transfer to shareholders in 2024"

"With reference to current reports No. 34/2023 of 29 September 2023, No. 35/2023 dated 25 October 2023 and No. 43/2023 dated 15 December 2023, and Current Report No. 23/2021 dated 23 June 2021, The Management Board of COMP S.A. with its registered office in Warsaw (hereinafter the "Company") hereby announces that in 2024 it plans to allocate for distribution to shareholders an amount of at least PLN 33,654,030.00 (thirty-three million six hundred and fifty-four thousand and thirty zlotys and 0/100) through the purchase of own shares based on existing authorisations from the General Meeting, i.e. the transfer of an amount equivalent to PLN 7.50 (seven zlotys and fifty groszy) per one of the 4,487,204 (four million four hundred and eighty-seven thousand two hundred and four) shares that would be eligible for a potential dividend for 2023.

At the same time, with a view to ensuring that the transfer to shareholders takes place as quickly as possible whilst aligning the timing and amounts of the transfer with cash flows, the Company's Management Board plans to make, by 18 March 2024, a transfer amounting to half of the total amount earmarked for transfer to shareholders in 2024, i.e. PLN 3.75 (three zlotys and seventy-five groszy) per share. In view of the above, and taking into account the limits on the number of shares the Company may hold under the provisions of the Commercial Companies Code and existing authorisations from the General Meeting, the Company's Management Board plans to acquire, by that date, no more than 117,672 shares at a price (rounded to zlotys) PLN 143.00 (one hundred and forty-three) per share, i.e. allocating no more than PLN 16,827,096.00 (sixteen million eight hundred and twenty-seven thousand ninety-six zlotys and 0/100) for transfer to shareholders.

The basic criteria guiding the Company's Management Board in deciding how to carry out the transfer of funds to shareholders have not changed since 2023 and were set out in Current Report No. 8/2023 of 31 May 2023."

Announcement of 5 June 2024 "Comp 2025 Next Generation Strategy – raising the target of the COMP 2025 Next Generation strategy regarding the transfer to shareholders in 2024."

"The results for the first quarter of 2024 confirm that we are successfully achieving all the objectives of our strategy. We have consolidated our position as a leader in the IT market, focusing on our key specialisations: cybersecurity and advanced technologies for the secure and efficient digitalisation of retail. In particular, the rapid growth of software offered under the SaaS subscription model, which has exceeded expectations, enables us, as stated in the first-quarter report, to increase our plans regarding returns to shareholders this year as well.

The transfer to shareholders will increase this year to a total of at least PLN 37,581,362.00, compared with the total of at least PLN 33,654,030.00 declared for this year in Report No. 8/2024 of 6 February 2024, representing a 23.2% increase compared to the amount of PLN 30,492,720.00 paid out last year.

It is also worth noting that the increase in the transfer compared to last year has been achieved without introducing new fiscalisation, mainly thanks to a significant increase in the profitability of recurring subscription revenues and optimisations of internal structures, which have been carried out progressively since 2022. These measures will continue. This is significant as it reduces our dependence on a changing environment, which is the main objective of the COMP 2025 Next Generation strategy.

Year-on-year earnings per share, as a result of systematic share buybacks and – consequently – a reduction in the number of shares eligible for the distribution, will rise even more sharply – by over 30.3% (at least PLN 8.5 compared to PLN 6.52).

The purchase of shares for PLN 16,827,096, as referred to in Report No. 11/2024 of 15 March 2024, and the planned cancellation of own shares, as announced in Report No. 24/2024 of 24 May 2024, will pave the way for the implementation of the second part of the transfer in the amount of at least PLN 20,754,266.00, which equates to at least PLN 4.75 per share in the second half of the year, based on the authorisation granted by the Company's General Meeting of Shareholders to buy back own shares."

Announcement of 26 November 2024 "Update of the parameters of the COMP 2025 Next Generation strategy"

"The Management Board of Comp S.A. with its registered office in Warsaw (the "Company") announces an update to the parameters of the COMP 2025 Next Generation strategy by raising the reported estimated EBITDA for 2024 to approximately PLN 120 million. The Company thereby confirms that it has exceeded the targets of the COMP 2025 Next Generation strategy set for the years 2022–2024 and, at the same time, has laid the foundations for further growth.

The Management Board of Comp S.A. notes that the term "estimated EBITDA" at consolidated level, as presented in this current report, is not defined in applicable accounting standards and may constitute an alternative performance measure (APM) within the meaning of ESMA Guidelines 2015/1415, the definition of which the Company included in Current Report No. 3/2022 of 31 March 2022."

Press release of 7 January 2025 "Achievement of the COMP 2025 Next strategy target"

"Comp S.A., with its registered office in Warsaw ("the Company"), announces that it has achieved the target level of the net financial debt ratio set out in the COMP 2025 Next Generation strategy and, consequently, this ratio will no longer be reported separately."

Furthermore, the Company notes that, as at 31 December 2024, it is possible that the net financial debt ratio at the end of 2024 may temporarily be significantly lower than that forecast in Current Report No. 3/2024 of 9 January 2024. As in the previous year, it should be noted that, after taking into account all liabilities related to contracts for 2024, the net financial debt ratio at the end of 2024 would stand at approximately 0.75 x EBITDA. This represents a decline to the target level envisaged in the COMP 2025 Next Generation strategy, which falls within the forecast range set out in the aforementioned current report.

The level of financial debt indicated above is a result of the growth in sales and the profitability of value-added services in the IT segment and subscription-based services in the Retail segment, as well as discipline in the implementation of the investment and cost budgets. The very favourable level of net financial debt as at 31 December 2024 is also a consequence of the early settlement of contracts in the IT segment at the end of the year, including advance payments made by customers. The achieved target financing structure enables further growth in distributions to shareholders, although the Company's management board's recommendations regarding distributions for 2024 will be made in the first quarter of 2025. The Company notes that the terms 'EBITDA' and 'net financial debt' at the consolidated level are not defined in applicable accounting standards and may constitute alternative performance measures (APMs) within the meaning of ESMA Guidelines 2015/1415, the definitions of which the Company included in Current Report No. 3/2022 dated 31 March 2022."

Announcement of 21 January 2025 "Comp 2025 Next Generation Strategy – raising the target of the COMP 2025 Next Generation strategy regarding returns to shareholders in 2025"

"The Management Board of COMP S.A., with its registered office in Warsaw (hereinafter referred to as the "Company"), announces that in 2025 it plans to allocate PLN 42 million for distribution to shareholders, compared with approximately PLN 37.6 million paid out last year. To date, our results, including the forecast results for 2024, confirm the effective

implementation of our strategy. We have consolidated our position as the IT market leader in our key specialisations: military and civilian cybersecurity, and advanced technologies supporting the secure and effective digitalisation of the retail sector. The sustained growth in operating profitability, observed continuously since 2022, enables us to increase the planned distribution of funds to shareholders this year as well. This growth is also made possible by achieving the Group's target financing structure, as we reported in Report No. 1/2025 dated 7 January 2025.

Pursuant to Resolution No. 23/2024 of the Company's Annual General Meeting of 27 June 2024 authorising the Management Board to acquire own shares, the transfer to shareholders will be made in two tranches of approximately PLN 21 million each. The first is planned to be carried out and settled no later than 15 March 2025, and the second tranche in the second half of the year, as has been the case in the last two years. The Management Board intends to submit a motion to the Annual General Meeting, which in recent years has been held in June each year, to redeem all treasury shares held by the Company, including those repurchased in the first tranche in 2025. This will contribute to a further improvement in all per-share ratios, including the value of the transfer to shareholders calculated on a per-share basis."

Press release dated 26 March 2025: "Strategy for the Comp Group entitled 'Comp 2028 Security First' for the years 2026–2028"

"The Management Board of Comp S.A. (hereinafter "the Company"), in cooperation with the Strategy Committee of the Company's Supervisory Board, has developed a new strategy entitled "Comp 2028 Security First", setting out the principles and objectives of the Comp Capital Group for the period from 2026 to 2028.

The primary objective of the "Security First" strategy is to ensure security and stability for the users of our solutions, our business partners and our shareholders. We base our plans on the Comp Group's position, built through the effective implementation of the "Next Generation" strategy since 2022.

We plan to leverage the high volatility of the market and technological environment to drive growth in the Comp Group's operating and cash flow results. We will achieve this through diversification combined with agile, situation-appropriate action across each of the Comp Group's many business streams and specialisations.

The most important of these are security in the defence sector, corporate cybersecurity, security for government administration, cybersecurity for critical and important entities (in accordance with NIS-2), the digitalisation of society (e-services) and the economy, the use of AI, SaaS-based online checkout networking services, the replacement of sales and payment terminals, SaaS-based vending and fiscalisation, returnable packaging (DRS), public transport, big data, development of the Electronic Surveillance System (SDE) in Poland and export of the SDE.

The key business objectives for the three-year period of the Security First strategy are:

1. to strengthen its position as the leading provider of digital security solutions for the military and public administration in Poland;
2. doubling financial results from secure SaaS solutions whilst maintaining the leading position in the market for multifunctional sales recording and settlement devices;
3. doubling revenue from the implementation and integration of cybersecurity services, including those necessary for the operation of the Security Operations Centre (SOC) and on-premises AI systems;
4. a twofold increase in international revenue, particularly from the export of electronic surveillance solutions.

We are maintaining the financial targets set out in the Next Generation strategy for 2025 as the starting point for the Security First strategy. This implies an increase in EBITDA to PLN 135 million and a distribution to shareholders of up to PLN 42 million in 2025. EBITDA and the distribution to shareholders will remain the sole financial targets of the Comp 2028 Security First strategy.

The successful implementation of the Security First strategy will deliver the following EBITDA figures: PLN 150 million in 2026, PLN 165 million in 2027 and PLN 180 million in 2028.

Thanks to the planned growth in EBITDA and the reduction in financial debt achieved as a result of implementing the Next Generation strategy to the targeted operating level, the projected transfer to shareholders will rise to PLN 70 million in 2026, PLN 79 million in 2027 and PLN 91 million in 2028. We estimate that

In the final year of the strategy, i.e. in 2028, as a result of further share buy-backs, the transfer will amount to no less than PLN 25 per share.

As with the Comp 2025 Next Generation strategy, the Comp 2028 Security First strategy envisages the buyback of own shares and their subsequent cancellation as the optimal and planned method of transferring funds to shareholders.

The Comp 2028 Security First strategy does not envisage major acquisitions, but in accordance with the principle of agile diversification and maintaining cash flow capacity, we will seek out new trends and opportunities in each of our business lines and specialisms.

The Company's Management Board notes that the term 'EBITDA' at the consolidated level, as presented in this current report, is not defined in applicable accounting standards and may constitute an Alternative Performance Measure (hereinafter 'APM') within the meaning of ESMA Guidelines 2015/1415.

Definition of the APM ratio used by the Company in this report, referring to the Company's most recently published consolidated financial statements (financial year 2023): Estimated EBITDA represents the estimated value of profit (loss) from operating activities (item H of the statement of profit or loss and other comprehensive income in the Company's consolidated financial statements for the relevant financial year) plus depreciation (notes to the statement of profit or loss and other comprehensive income in the Company's consolidated financial statements for the relevant financial year).

EBITDA is a measure reflecting the Company's ability to generate cash from its core operations. EBITDA is a measure commonly used in financial analysis to provide a summary assessment of the financial health of a company or its group; however, it should be noted that the method of calculation may vary between different entities.

Furthermore, there were no circumstances other than those recognised and described in this report that could have a material impact on the Capital Group's financial results or its ability to meet its obligations."

3. Information on the anticipated development of the Comp S.A. Group

The Comp S.A. Capital Group focuses on operations in several attractive market niches, drawing on its unique expertise and the high barriers to entry in each of these areas:

- electronic security and cybersecurity, forming the core of the IT segment;
- services for small and medium-sized enterprises and the manufacture of fiscal devices, which form the core of the retail segment.

In both of the above-mentioned areas, the Comp S.A. Capital Group invests in the development of its own technologies, creates products and expands simultaneously across several markets – which allows it to diversify its revenue streams and significantly reduce its dependence on economic fluctuations in individual markets.

An increase in the share of VAS services and solutions within the Group's sales structure is planned. This trend will continue and grow alongside the wider adoption of VAS services on Comp S.A.'s fiscal devices, the development of the M/platform for cloud-based projects and selected virtual fiscal solutions, and the provision of these solutions to new customer groups.

In 2024, revenue from subscription services (on fiscal devices and M/platforms) amounted to PLN 45.3 million (compared to PLN 38.4 million in 2023), and revenue of approximately PLN 50 million is projected for 2025.

Public administration

The Comp S.A. Capital Group has an established position in the public sector, a range of unique specialisations, and boasts a large portfolio of references as well as significant implementation capacity. Furthermore, the development of e-services, digitalisation and enhancing the security of government and local authority systems is a priority area of activity with funding secured from both the national budget and EU funds. A significant area of the Group's operations is the military sector, for which it offers a wide range of solutions based on both its own products and the sale of advanced technologies from third-party companies.

Despite the public sector accounting for a large proportion of the IT segment's total sales (around 70%), the Group maintains a diversified revenue base. The Ministry of Defence is the Comp Group's largest client in the IT segment; however, there is no significant reliance on any single project, and the range of product categories on offer is also highly varied. This ensures a high degree of security in terms of revenue sources.

The Group invests in the development of its own security solutions and expertise in order to offer a wide range of products and services tailored to specific customer groups. In 2024, the Group carried out several long-term contracts: a contract with the Ministry of Justice, continued since 2022, an agreement with the Ministry of Justice for the development and maintenance of the Electronic Surveillance System, an agreement with an entity representing the State Treasury for the construction of the HPDA data centre, and a number of other agreements related to providing support and development for systems implemented at clients' premises in previous years.

The Group is actively operating in the market for solutions designed to ensure the cybersecurity of clients in the public, local government and healthcare sectors, who, amongst other things, are subject to regulations related to the implementation of the NIS2 Directive and are utilising funds from the National Recovery Plan for the implementation of e-services or to enhance cyber resilience.

With regard to its Electronic Surveillance System offering, the Group is also undertaking activities outside the Polish market. Projects are being carried out in Armenia and the Czech Republic. In addition to the aforementioned activities already undertaken, a number of commercial activities are planned in countries where the introduction, expansion or extension of Electronic Surveillance System-type systems is planned.

The large enterprise market

A key market for the Comp S.A. Group is the market for large enterprises in the telecommunications, industrial and energy, transport, and finance sectors. The Group has established itself as a supplier of advanced IT solutions, including security solutions, to a number of large enterprises. In the Group's assessment, the broadly defined cybersecurity market has significant growth potential, primarily due to widespread digitalisation, but also because of rising geopolitical tensions, which have an indirect impact on clients' budgetary strategies. This applies in particular to network security infrastructure (NG Firewall, IPS, AV, ATP systems), SIEM/SOAR monitoring, endpoint and server security (EDR, XDR), cloud security solutions, and consultancy services provided by the Comp Group.

Retail Market

In this area, the Comp S.A. Capital Group offers a complete range of products, primarily of its own manufacture (including the fiscal market), and services. The offering is aimed at both small and medium-sized enterprises and clients with nationwide sales networks. The Comp S.A. Group intends to further increase its share of the domestic market, inter alia through the launch of innovative products, as well as services based on cloud solutions of the integrated service platform – the M/platform project – and virtual and hybrid fiscal solutions under the Novitus and Elzab brands.

The Group develops not only innovative fiscal devices and sales systems, but also complete self-service checkout stations. These are a response to the continuing strong trend of providing customers with self-service stations in virtually every shop. An important addition to the range is the distribution of a wide variety of checkout and shop fittings, automatic identification devices, and anti-theft and surveillance systems. The systems and devices offered by the Comp S.A. provide retail customers with a complete workspace equipped with tools for effective competition and offer an opportunity to increase their revenue, which is a significant competitive advantage.

Subscription fees, linked to increasingly widespread virtual solutions, will be a key growth driver. Examples of such solutions include virtual services for passenger transport operators and taxis, under the Novitus and Elzab brands, or fiscal solutions for automatic car washes developed under the Novitus brand, where the Company is the undisputed market leader. In addition, cloud-based services are being developed that integrate with cash registers and support businesses in business management, such as the NoviCloud system, or ticketing solutions for public transport, whose subscriptions represent another steadily growing source of revenue.

Outsourcing as a service delivery model

The entities within the Group are able to meet a wide range of clients' IT needs and possess the ability to combine technical expertise with an understanding of business requirements.

This enables us to offer a comprehensive ICT outsourcing service tailored to our clients' requirements.

The Comp S.A. Capital Group has a nationwide infrastructure and qualified specialists covering a very wide range of technologies and products.

The Group acts as a partner for many global computer hardware manufacturers, providing nationwide authorised warranty service on their behalf.

4. Key achievements in research and development.

In recent years, Comp S.A., together with the companies of the Capital Group, has conducted intensive research and development work in the field of modernising existing proprietary products, as well as developing and introducing new products and services into production and sales in areas key to Comp S.A.: the retail market, specialised security and cryptography.

Most of the expenditure currently incurred by the companies within the Capital Group on research and development relates to the development of new projects. The specific nature of the niche in which the Comp S.A. Capital Group operates, as well as the aim to maintain a competitive position in the market, means that the nature of these projects cannot be described before the finished products are launched.

In 2024 and subsequent years, expenditure on R&D projects, including those co-funded by the National Centre for Research and Development (NCBiR), will continue; these projects involve the creation of cryptographic products designed to protect classified information for military and civilian purposes. In 2024, further activities will also be undertaken in relation to the development of electronic monitoring (SDE) products, including the expansion of their functionality to meet the requirements of foreign markets.

In 2024, the R&D phase of the project "Innovative system for the rapid and mass detection and neutralisation of cyberattacks on internet users" was completed in the field of cybersecurity. As a result of the project, a solution was developed comprising modules that enable the detection of security breaches affecting Internet users, without compromising the confidentiality and privacy of users' data transmissions. The research and development work carried out as part of the project was co-financed by European Funds. In 2024, the commercialisation of the Treatnet software suite, developed as a result of the aforementioned project, was carried out.

In 2024, work continued on projects to develop the M/platform system, with a focus on developing services for the FMCG market.

5. Key economic and financial indicators and the current and projected financial position.

5.1. Consolidated Statement of Financial Position.

Balance	as at 31 December 2024	% of total assets	as at 31 December 2023	% of total assets
1 Fixed assets	520,704	51.8%	538,251	58.6%
2 Current assets	485,210	48.2%	380,246	41.4%
Total assets	1,005,914	100.0%	918,497	100.0%
1 Equity	458,173	45.5%	458,292	49.9%
2 Long-term liabilities	128,524	12.8%	88,461	9.6%
3 Current liabilities	419,217	41.7%	371,744	40.5%
Total liabilities	547,741	54.5%	460,205	50.1%
Total liabilities	1,005,914	100.0%	918,497	100.0%

5.2. Consolidated Statement of Profit or Loss and Other Comprehensive Income.

Item	Year 2024 current period from 01.01.2024 to 31 December 2024	Change	Year 2023 comparable period from 01/01/2023 to 31 December 2023
1 Revenue from sales	903,254	-9.4%	997,503
2 Cost of sales	616,540	-14.6%	721,589
3 Gross profit (loss) on sales	286,714	3.9%	275,914
4 Operating profit (loss) (EBIT)	71,105	7.6%	66,058
5 EBITDA	121,827	10.3%	110,444
6 Gross profit (loss)	55,929	28.5%	43,535
7 Net profit (loss) for the financial year	38,768	-176.2%	(50,879)
8 Total comprehensive income	37,528	174.7%	(50,220)

5.3. Consolidated Statement of Cash Flows.

Item	Year 2024 current period from 01.01.2024 to 31 December 2024	Year 2023 comparable period from 01/01/2023 to 31 December 2023
1 Net cash flow from operating activities	204,493	219,532
2 Net cash flow from investing activities	(32,110)	(33,686)
3 Net cash flows from financing activities	(60,882)	(149,722)
Change in cash and cash equivalents	111,501	36,124

Given the outlook for the Group in the Retail and IT segments, a stable and sound financial position is anticipated.

6. Key financial performance indicators relating to the entity's operations.

Ratios	Year 2024 current period from 01.01.2024 to 31 December 2024	Year 2023 comparable period from 01/01/2023 to 31 December 2023
1 Gross profit margin	32%	28%
2 EBIT margin	8%	7%
3 EBITDA margin	13%	11%
4 Net profit margin	4%	-5%
5 Return on equity (ROE)	8%	-11%
6 Return on assets (ROA)	4%	-6%
7 Current ratio	1.2	1.0
8 Quick ratio	1.0	0.8
9 Total debt ratio	54%	50%
10 Inventory turnover cycle in days	45	51
11 Accounts receivable turnover in days	58	56
12 Accounts payable turnover in days	72	62

Rules for calculating ratios:

1 gross profit on sales/sales revenue

2 operating profit/sales revenue

3 operating profit + depreciation/sales revenue

4 net profit/sales revenue

5 net profit/equity

6 net profit/total assets

7 current assets/current liabilities

8 current assets – inventories / current liabilities

9 liabilities/total liabilities

10 inventories* × number of days in the period / cost of sales

11 trade receivables* × number of days in the period / sales revenue

12 trade payables* × number of days in the period / (cost of sales + selling expenses + general and administrative expenses)

* (opening balance + closing balance)/2

RATIO	<i>balance as at 31 December 2024</i>	<i>balance as at 31 December 2023</i>
Net financial debt	-59,804	47,097

The level of net financial debt represents the value of interest-bearing liabilities (items: B I, B V, B VI and C I, C V, C VI of the liabilities section of the Statement of Financial Position), less the value of cash and cash equivalents held (presented in note 21 of this report). The level of net financial debt is a measure of the Capital Group's current debt.

7. Information on treasury shares, including:

- a) the reason for the acquisition of own shares during the financial year,**
- b) the number and nominal value of shares acquired and disposed of during the financial year, and in the absence of a nominal value – their carrying amount, as well as the portion of share capital that these shares represent,**
- c) in the case of a purchase or sale for consideration – the equivalent value of those shares,**
- d) the number and nominal value of all shares acquired and retained, and in the absence of a nominal value – the book value, as well as the portion of the share capital that these shares represent.**

BUYBACK OF OWN SHARES

In accordance with Current Report No. 8/2024 of 6 February 2024, the Company's Management Board envisaged a dividend of at least PLN 7.50 per share in 2024, i.e. a total payout of at least PLN 33,654,030.00 through the purchase of own shares based on existing authorisations from the General Meeting.

In accordance with the above announcement, following the "Invitation to submit offers to sell shares in Comp S.A." published in Current Report No. 10/2024 of 29 February 2024, on 15 March 2024 the Company acquired 117,672 shares at a price of PLN 143.00 per share, i.e. it allocated PLN 16,827,096.00 for transfer to shareholders, as announced by the Company in Current Report No. 11/2024 of 15 March 2024. The shares in question, with a total nominal value of PLN 294,180.00, represented 2.16% of the share capital and conferred 117,672 votes at the Company's general meeting, which constituted 2.16% of the total number of votes at the Company's general meeting. Following the transaction, the Company, together with its subsidiaries, held 1,092,323 shares, which represented 20.00% of the share capital and conferred 1,092,323 votes at the Company's general meeting, representing 20.00% of the total number of votes at the Company's general meeting.

Subsequently, in Current Report No. 25/2024 of 5 June 2024, the Company raised the target for the transfer to shareholders in 2024. Accordingly, the transfer to shareholders in 2024 was to increase to a total amount of at least PLN 37,581,362.00, compared to the total amount of at least PLN 33,654,030.00 declared for that year in Report No. 8/2024 of 6 February 2024, representing a 23.2% increase compared to the amount of PLN 30,492,720.00 paid out in 2023.

On 31 July 2024, the Company's share capital was reduced through the cancellation of 943,323 ordinary bearer shares of series K, L and N held by the Company (i.e. 679,639 ordinary bearer shares of series K; 263,471 Series L ordinary bearer shares; 213 Series N ordinary bearer shares), representing a total of 17.27% of the Company's share capital, which corresponded to 943,323 votes at the Company's general meeting, and which constituted 17.27% of the total number of votes at the Company's general meeting prior to the registration of the share capital reduction.

Subsequently, following the "Invitation to submit offers to sell shares in Comp S.A." announced in Current Report No. 45/2024 of 29 November 2024, "Invitation to submit offers to sell shares in Comp S.A.", on 16 December 2024 the Company acquired 148,245 shares at a price of PLN 140 per share, i.e. it allocated the sum of PLN 20,754,300.00, as announced by the Company in Current Report No. 51/2024 dated 17 December 2024. The shares in question represented 3.28% of the share capital and conferred 148,245 votes at the Company's general meeting, which constituted 3.28% of the total

number of votes at the Company's general meeting. Following the transaction, the Company held 297,245 shares, which represented 6.58% of the share capital and conferred 297,245 votes at the Company's general meeting, representing 6.58% of the total number of votes at the Company's general meeting.

Following the balance sheet date, in Current Report No. 2/2025 dated 21 January 2025, the Company's management announced that in 2025 it plans to allocate PLN 42 million for distribution to shareholders, compared with approximately PLN 37.6 million paid out in 2024. Furthermore, the Company's Management Board indicated that the distribution to shareholders would be made in two tranches of approximately PLN 21 million each.

Pursuant to the "Invitation to submit offers to sell shares in Comp S.A." announced on 18 February 2025, as set out in Current Report No. 4/2025 of 18 February 2025, on 7 March 2025 the Company acquired 120,000 shares at a price of PLN 175.00 per share, i.e. it allocated PLN 21,000,000.00 for transfer to the shareholders, as announced by the Company in Current Report No. 5/2025 of 7 March 2025. The shares in question, with a total nominal value of PLN 300,000.00, represent approximately 2.66% of the share capital and confer 120,000 votes at the Company's general meeting, which constitutes approximately 2.66% of the total number of votes at the Company's general meeting. Following the transaction, the Company holds 417,245 shares, which represent approximately 9.23% of the share capital and confer 417,245 votes at the Company's general meeting, representing approximately 9.23% of the total number of votes at the Company's general meeting.

No voting rights are exercised at the Company's general meeting in respect of the treasury shares held by the Company. The Company's Management Board intends to submit a proposal to the annual general meeting – which in recent years has been held in June each year – to cancel all treasury shares held by the Company, including those repurchased in the first tranche in 2025. This will contribute to a further improvement in all per-share ratios, including the value of the transfer to shareholders calculated on a per-share basis.

As at the balance sheet date, Comp S.A. holds 297,245 of the Company's own shares. These shares represent 6.58% of the Company's share capital and entitle the holder to 297,245 votes at the Company's AGM, representing 6.58% of the voting rights at the AGM. These shares are treated as treasury shares; Comp S.A. does not exercise voting rights at the AGM.

Number of treasury shares	Nominal value of treasury shares	Proportion of treasury shares in the share capital
Held by Comp S.A.: 297,245 shares	PLN 743,112.50	6.58%

At present, the Company has no plans to issue new shares.

8. Branches (plants) owned by the issuer.

During the reporting period, the Company had the following self-accounting branches:

- Sales Technology Centre Branch, located at 118 Nawojowska Street in Nowy Sącz,
- the Warsaw IT Branch, located at 116 Jutrzenki Street in Warsaw.

9. Financial instruments relating to:

a) risk: price fluctuations, credit risk, significant disruptions to cash flows and loss of financial liquidity to which the entity is exposed,

b) the entity's adopted objectives and methods of financial risk management, including methods of hedging significant types of planned transactions for which hedge accounting is applied.

The activities carried out by the Group are exposed to various types of financial risk: market risk (including the risk of changes in exchange rates and interest rates, as well as market prices of debt and equity instruments), credit risk and liquidity risk.

The Group's overall risk management programme focuses on the unpredictability of financial markets and seeks to minimise their potential negative impact on the Group's financial results.

In order to minimise financial risk, the companies of the Comp S.A. Group use, to a limited extent, derivative financial instruments such as foreign exchange forward contracts, interest rate options and interest rate swaps (IRS).

The main financial instruments used by the Group include: bank loans, lease agreements, cash and deposits, and loans granted. The main purpose of these instruments is to raise funds for the Group's operations, manage liquidity risk, and invest surplus cash on an ad hoc basis. The Group also holds other financial instruments, including trade receivables and payables arising directly from its operations.

Credit risk

Credit risk is understood as the inability of the Capital Group's creditors to meet their obligations, which would expose the Capital Group to financial losses.

The financial assets most exposed to credit risk are trade receivables, cash and cash equivalents, deposits and loans granted.

The Group applies an appropriate credit policy consisting of selling products, providing services and offering financing, predominantly to customers with a proven credit history and creditworthiness.

The Comp S.A. Group is not exposed to significant credit risk in relation to a single counterparty or a group of counterparties with similar characteristics. Apart from the Ministry of National Defence (whose share of the Capital Group's sales revenue in 2024 amounted to approximately 28%), there is no concentration of risk associated with the existence of a single customer or a group of related customers from whom the Capital Group would derive revenue exceeding 10% of its total revenue.

The Group mitigates risk by entering into transactions exclusively with entities in a sound financial position. The risk of bad debts is mitigated through the ongoing monitoring of receivables and, where necessary, debt recovery measures.

In the Retail segment, which sells fiscal and non-fiscal devices, software and services to commercial and service entities mainly through a partner network, credit risk is managed by granting credit limits to counterparties based on their long-standing history of cooperation.

With regard to the financial assets of the Comp S.A. Group, the maximum exposure to credit risk is equal to their carrying amounts.

Currency risk

Currency risk is understood as the adverse impact of changes in exchange rates on the Capital Group's financial results. The Capital Group seeks to mitigate this risk by entering into hedging (forward) transactions for selected contracts.

In addition to hedging through forward transactions, a policy is applied to mitigate the negative effects of exchange rate fluctuations, such that in many cases the value of contracts entered into is denominated in the same currency as the settlement with the supplier, and payment is made at the exchange rate on the date the invoice is issued. Currency risk in the Group's operations is low due to the scale of transactions conducted in foreign currencies.

The aim of currency risk management within the Group is to hedge payments denominated in foreign currencies against the adverse effects of exchange rate fluctuations, thereby ensuring an appropriate margin on commercial contracts or manufactured equipment.

Interest rate risk

Interest rate risk is understood as the adverse impact of changes in interest rates on the Company's financial results.

The objective of interest rate risk management is to achieve a situation where the interest rate on assets exceeds the interest rate on liabilities.

The Company is exposed to interest rate risk arising from bank loans taken out, lease agreements entered into, loans granted, and cash and deposits in bank accounts, the interest rates on which are mainly based on WIBOR rates.

Price risk

The Comp S.A. Group does not hold any financial instruments exposed to risk arising from changes in the prices of commodities, equity instruments or other market risks other than those described in the remaining sections, and Series C bonds issued by Malopolska Sieć Szerokopasmowa Sp. z o.o., which have not been repaid by the issuer since 2016. Detailed information on the enforcement measures taken is included in the Company's interim reports for the relevant reporting periods of 2021, 2022 and 2023.

Liquidity risk

The Parent Company monitors liquidity within the Group, providing support as required and in accordance with the cash position of Group companies. This process is carried out on the basis of information obtained from the Group companies and internal reports concerning the Parent Company's cash position and its estimates for subsequent periods, taking into account current debt and planned receipts and expenditure. Monitoring over longer periods (years) is based on an analysis of a model founded on estimates. This liquidity monitoring is particularly important in the current geopolitical situation related to the war in Ukraine.

RATIO	as at 31 December 2024	as at 31 December 2023
Net financial debt*	-59,804	47,097

The level of net financial debt represents the value of interest-bearing liabilities (items: B I, B V, B VI and C I, C V, C VI of the liabilities section of the Statement of Financial Position), less the value of cash and cash equivalents held (presented in note 21 of this report). The level of net financial debt is a measure of the Capital Group's current debt.

Net financial debt, including "IFRS 16", at the end of 2024 amounted to approximately PLN -59.8 million (the value of cash and cash equivalents exceeded the value of interest-bearing liabilities).

As in the previous year, the significantly lower level of net financial debt is a consequence of contract settlements in the IT segment, in the form of early payments by public sector clients made at the end of the year, including advance payments made by clients.

It should be noted, as we reported in our current report (see: Report 1/2025), that after taking into account all liabilities relating to contracts for 2024, the net financial debt ratio at the end of 2024 would stand at approximately 0.75 times EBITDA. This represents a decline to the target level set out in the COMP 2025 Next Generation strategy. The level of financial debt indicated above is a result of growth in sales and profitability of value-added services in the IT segment and subscription-based services in the Retail segment, as well as discipline in the execution of the capital expenditure and cost budgets.

We confirm the effective implementation of strategic objectives and the achievement of the target level of the net financial debt ratio, as well as the maintenance of its value within the range of approximately 0.5 to approximately 1.1 x EBITDA as the target during the strategy implementation period.

The Group monitors the risk of loss of financial liquidity, understood as the ability to settle liabilities within the specified deadlines. Liquidity risk arises from a mismatch between the amounts and maturity dates of assets and liabilities (related to the possibility of payment delays or postponement of the execution of certain contracts).

Measures are taken on an ongoing basis to minimise the risk of the Group losing liquidity. The Group is in constant contact with both its counterparties and the financial institutions providing financing. An ongoing analysis of cash requirements and sources of funding is also carried out.

In view of the above, in the opinion of the Company's Management Board, the risk of liquidity loss is being properly monitored, and the likelihood of adverse events occurring is significantly reduced. Furthermore, should such events occur, the Group holds assets sufficient to fully cover the risk of liquidity loss.

10. Description of significant risk factors and threats, specifying the extent to which the issuer is exposed to them.

10.1. Risk factors related to the Capital Group's operating activities.

Currency risk

Currency risk is understood as the adverse impact of changes in exchange rates on the Capital Group's financial results. The Capital Group seeks to mitigate this risk by entering into hedging (forward) transactions for selected contracts.

In addition to hedging through forward contracts, a policy is in place to mitigate the adverse effects of exchange rate fluctuations, such that, in many cases, the value of contracts entered into is denominated in the same currency as the settlement with the supplier, and payment is made at the exchange rate prevailing on the date the invoice is issued. Currency risk in the Group's operations is low due to the scale of transactions conducted in foreign currencies.

The aim of currency risk management within the Group is to hedge payments denominated in foreign currencies against the adverse effects of exchange rate fluctuations, ensuring an appropriate margin on commercial contracts or manufactured equipment.

Risk associated with the loss of key employees

The operations of the companies within the Comp S.A. Group are primarily based on the knowledge and experience of a highly qualified workforce. This is a characteristic feature of companies operating in the information technology sector. The main method of attracting highly qualified staff is to offer them competitive working conditions and remuneration. There is a potential risk of key employees leaving, which could cause delays in the fulfilment of the company's obligations towards its customers or in the development of its own products.

To counter this risk, the Group takes the following measures:

- creating and implementing effective incentive schemes,
- building relationships between the organisation and its employees,
- monitoring the labour market and, where possible, offering competitive terms of employment.

10.2. Risk factors related to the environment in which the Companies of the Capital Group operate.

Risk associated with changes in the growth rate of the IT market in Poland

Given the economic situation, it is important to note the IT market's sensitivity to economic fluctuations, which directly constrain businesses' investment policies, including expenditure on IT modernisation.

At the same time, the broadly defined cybersecurity market, which is one of the main specialisations within the IT COMP Segment, has significant growth potential due, amongst other things, to rising geopolitical tensions, which have an indirect impact on clients' budgetary strategies. This applies in particular to infrastructure (NG Firewall, IPS, AV, ATP systems, SIEM/SOAR monitoring and services provided by the Company).

In order to mitigate the risk associated with a potential slowdown in growth in the IT market, the Comp S.A. Capital Group is taking steps to offer new services and solutions, including innovative ones, by diversifying its portfolio, and is also striving to spread sales evenly across several different market sectors, thereby reducing its dependence on the economic conditions of any single sector. Such measures improve the Comp S.A. Capital Group's position relative to the competition and will enable continued growth

even even in the event of an economic downturn. Another form of protection against market fluctuations is the Comp S.A. Capital Group entering into long-term contracts.

The threat of competition from global corporations

The Polish IT market strongly attracts international corporations, including giants from the IT sector. By leveraging the expertise, financial resources and experience of their global organisations, these companies strive to gain a competitive advantage.

Aware of these threats, the companies within the Comp S.A. Capital Group are taking a range of measures to mitigate them.

An example of such measures is the Comp S.A. Capital Group's focus on advanced specialisations and niche segments of the IT services market. An additional strength is the Group's extensive experience in information security and the possession of its own certified technologies for building security systems.

Risk of operating in a regulated market

The Company's operations are dependent on regulatory decisions such as, amongst others: licences, certificates, approvals or attestations. Consequently, it bears the risk of obtaining or renewing these in markets where they are required.

11. Indication of proceedings pending before a court, an arbitration body or a public administration body, including information regarding:

a) proceedings concerning the liabilities or claims of the issuer or its subsidiary, the value of which constitutes at least 10% of the issuer's equity, specifying: the subject matter of the proceedings, the value of the dispute, the date of commencement of the proceedings, the parties to the proceedings and the issuer's position,

b) two or more proceedings concerning liabilities and claims, the aggregate value of which amounts to at least 10% of the issuer's equity, specifying the aggregate value of the proceedings separately for the group of liabilities and the group of claims, together with the issuer's position on the matter and in relation to the largest proceedings within the group of liabilities and the group of claims

- specifying the subject matter, the value of the claim, the date of commencement of the proceedings and the parties to the proceedings.

To the best of the Company's Management Board's knowledge, as at the date of this report, no such proceedings are pending.

12. Information on the issuer's principal products, goods or services, including their value and volume, and the share of individual products, goods and services (where material) or groups thereof in the issuer's total sales, as well as any changes in this respect during the financial year.

SALES REVENUE – PRODUCT BREAKDOWN	Year 2024 current period from 01/01/2024 to 31.12.2024	Year 2023 comparative period from 01/01/2023 to 31 December 2023
1 Net revenue from the sale of services	329,286	346,278
2 Net revenue from the sale of products	179,077	179,011
3 Net revenue from the sale of goods and materials	394,891	472,214
Total sales revenue	903,254	997,503

STRUCTURE OF SALES REVENUE	Year 2024 Current period from 01/01/2024 to 31 December 2024	%	Year 2023 comparative period from 1 January 2023 to 31 December 2023	%
1 Sales of materials	9,587	1%	11,161	1%
2 Sales of goods	385,304	43%	461,053	46%
3 Sales of products	179,077	20%	179,011	18%
4 Sales of services	329,286	36%	346,278	35%
Total sales revenue	903,254	100%	997,503	100%

13. Information on sales markets, including a breakdown into domestic and foreign markets, and information on sources of supply for production materials, goods and services, specifying dependence on one or more customers and suppliers, and where the share of a single customer or supplier reaches at least 10% of total sales revenue - the name (company name) of the supplier or customer, their share of sales or supply, and their formal links with the issuer.

Breakdown of Comp S.A.'s sales revenue by market segment:

SALES REVENUE BY MARKET SEGMENT	2024 current period from 01/01/2024 to 31.12.2024	%	2023 comparable period from 01/01/2023 to 31 December 2023	%
1 Administration (including uniformed services)	44,911	9.1%	86,925	15.3%
2 Telecommunications	33,295	6.7%	63,594	11.2%
3 Industry, Transport and Energy	38,575	7.8%	69,141	12.1%
4 Finance and Banking	30,068	6.1%	57,348	10.1%
5 Trade and services	271,411	55.0%	218,449	38.4%
6 IT	61,255	12.4%	46,457	8.2%
7 Insurance	7,186	1.5%	13,908	2.4%
8 Other	6,820	1.4%	13,200	2.3%
Net sales revenue	493,521	100.0%	569,022	100.0

Structure of sales revenue of the Comp S.A. Group by market segment:

SALES REVENUE BY MARKET SEGMENT	Year 2024 current period from 01/01/2024 to 31 December 2024	%	Year 2023 comparative period from 1 January 2023 to 31 December 2023	%
1 Administration (including uniformed services)	360,508	39.9%	356,147	35.7%
2 Telecommunications	33,754	3.7%	64,680	6.5%
3 Industry, Transport and Energy	49,798	5.5%	81,238	8.1%
4 Finance and Banking	37,120	4.1%	62,417	6.3%
5 Trade and services	316,187	35.1%	343,985	34.5%
6 IT	79,484	8.8%	49,751	5.0%
7 Insurance	12,464	1.4%	17,387	1.7%
8 Other	13,939	1.5%	21,898	2.2%
Net sales revenue	903,254	100.0%	997,503	100.0%

In 2024, just over 95% of sales revenue was generated on the domestic market.

GEOGRAPHICAL SEGMENTS	Year 2024 <i>current period from 01/01/2024 to 31 December 2024</i>	Year 2023 <i>comparative period from 1 January 2023 to 31 December 2023</i>
Revenue from sales to the Polish market:		
- in value	856,795	951,352
- as a percentage	94.86%	95.37%
Revenue generated from export sales within the European Union:		
- by value	40,724	37,721
- as a percentage	4.51%	3.78%
Revenue from exports outside the European Union:		
- by value	5,735	8,430
- as a percentage	0.63%	0.85%

As the core elements of the Group's product range are targeted at large enterprises and the public sector in the broadest sense, a significant volume of sales is generated in the Mazowieckie Voivodeship. The Group's range of security systems is primarily aimed at the public sector and telecommunications, as well as enterprises managing the country's so-called critical infrastructure. Seasonal fluctuations in the share of individual markets in sales result from the project-based and tender-driven nature of the Group's operations. The Group also undertakes multi-year projects, the implementation of which influences the share of individual market segments in sales.

The Comp S.A. Capital Group is not exposed to significant credit risk in relation to a single counterparty or a group of counterparties with similar characteristics. Apart from the Ministry of National Defence (whose share of the Capital Group's sales revenue in 2024 amounted to approximately 28%), there is no concentration of risk associated with the existence of a single customer or a group of related customers from whom the Capital Group would derive revenue exceeding 10% of total revenue.

The Group mitigates this risk by entering into transactions exclusively with entities in a sound financial position. The risk of uncollectible receivables is mitigated through ongoing monitoring of receivables and, where necessary, debt recovery measures.

In the Retail segment, which sells fiscal and non-fiscal devices, software and services to retail and service businesses primarily through a partner network, credit risk is managed by granting credit limits to counterparties based on their long-standing history of cooperation.

14. Information on contracts concluded that are significant to the entity's operations, including contracts known to the entity concluded between shareholders (partners), insurance contracts, and cooperation or collaboration agreements.

On 2 September 2024, the Management Board of Comp S.A. received information from its subsidiary, Enigma SOI Sp. z o.o., regarding the conclusion of a contract for transport nodes for ICT systems with an entity acting as a representative of the State Treasury.

The gross value of the contract for the basic scope is PLN 53,845,974.45, with the contract additionally providing for the possibility of carrying out additional works with a maximum gross value of PLN 37,670,344.08.

The contract in question, in its basic scope, is to be performed within 99 to 180 calendar days from the date of conclusion of the contract. The option may be exercised within 12 months of the date of conclusion of the contract, in which case it is to be performed within 240 calendar days of the date of delivery of the notice of exercise of the option.

The remaining terms of the agreement do not differ from those typically applied to agreements of this type.

On 3 September 2024, the Company entered into a guarantee agreement with TD SYNEX Poland Sp. z o.o., with its registered office in Warsaw, for the liabilities of its subsidiary, i.e. Enigma SOI Sp. z o.o., with its registered office in Warsaw, up to the amount of PLN 67,000,000.00, plus any interest and costs. The guarantee is valid until 31 August 2025 in

in respect of liabilities arising from 2 September 2024 to 28 February 2025. Under the agreement, the Company will be jointly and severally liable for the liabilities of Enigma SOI Sp. z o.o. arising from commercial orders placed during the aforementioned period and fulfilled for the benefit of Enigma SOI Sp. z o.o.'s customers in connection with contracts performed on their behalf, including, amongst others, the contracts referred to in current reports No. 36/2022 of 29 November 2022 and No. 39/2024 of 2 September 2024.

The remaining terms of the agreement do not differ from those typically applied to agreements of this kind.

After the balance sheet date, on 21 February 2025, TD SYNEX Poland Sp. z o.o. issued a statement that, as of 21 February 2025, it was releasing the legal security for the repayment of the debt in the form of a civil guarantee provided by Comp S.A. in favour of Enigma Systemy Ochrony Informacji Sp. z o.o.

Insurance policies

The companies of the Comp S.A. Group hold the following insurance policies:

- Business liability insurance, including product liability cover,
- Professional liability insurance,
- Group Accident Insurance,
- Directors' and Officers' Liability Insurance,
- All-risk property insurance against loss or damage,
- Electronic equipment insurance,
- Motor insurance for owned and leased vehicles,
- Property insurance for domestic and international transport,
- Insurance for overseas business travel,
- Criminal and tax liability insurance,
- Loss of profits insurance,
- Cyber risk insurance,
- Group insurance for employees.

Apart from the above, to the best of the Company's knowledge, no significant agreements relevant to the Company's operations were concluded at that time between shareholders (partners), nor were any significant insurance, partnership or cooperation agreements entered into.

15. Information on the issuer's organisational or capital links with other entities and a description of its main domestic and foreign investments (securities, financial instruments, intangible assets and property), including capital investments made outside its group of related entities, and a description of the methods used to finance them.

In 2024, the Capital Group did not incur any significant expenditure on financial assets, securities and capital investments that would not have been recognised in this report.

INCURRED AND PLANNED CAPITAL EXPENDITURE	<i>Incurring in 2024</i>	<i>Incurring in 2023</i>
1 Non-financial fixed assets	8,376	12,511
2 Acquisitions of companies / share capital increases in companies *	1,331	-
3 Research and development	26,974	29,881
Total	36,681	42,392

**Only capital expenditure – cash outlays – is shown.*

In 2024, the Comp S.A. Capital Group planned to make capital expenditure (on tangible fixed assets (non-financial) and intangible assets, as well as on research and development) amounting to approximately PLN 35 million.

In 2025, the Comp S.A. Capital Group plans to make capital expenditure (on tangible fixed assets and on intangible assets (including research and development)) of approximately PLN 38 million.

The above data does not include information on planned capital investments.

16. Information on transactions entered into by the issuer or its subsidiary with related parties on terms other than market terms, together with their amounts and information specifying the nature of these transactions.

All transactions with related parties were concluded on market terms.

17. Information on loan and credit agreements entered into and terminated during the financial year, specifying at least their amount, type, interest rate, currency and maturity date.

In addition to the loans and borrowings from outside the Comp S.A. Group taken out in the current year, as described in Note 26a, a description of loans taken out within the Group is provided below.

On 17 January 2024, Comp S.A. granted a loan to Comp Centrum Innowacji Sp. z o.o. in the amount of PLN 1,300,000. The repayment date for the loan was set for 17 January 2026. The loan is secured by a blank promissory note 'on demand' together with a promissory note declaration.

On 8 February 2024, Comp S.A. signed Annex No. 6 to the loan agreement of 11 October 2016 with Elzab Hellas SPV Sp. z o.o., in which the loan repayment date was extended to 31 December 2024.

On 14 February 2024, Comp S.A. granted a loan to Polski System Korzyści Sp. z o.o. in the amount of PLN 300,000. The repayment date of the loan was set for 14 February 2026. The loan is secured by a blank promissory note "on demand" together with a promissory note declaration.

On 27 March 2024, Comp S.A. granted a loan to Polski System Korzyści Sp. z o.o. in the amount of PLN 1,500,000. The repayment date for the loan was set for 27 March 2025. The loan is secured by a blank promissory note payable on demand, together with a promissory note declaration.

On 27 March 2024, Elzab Hellas SPV Sp. z o.o. made a partial repayment of the loan dated 11 October 2016, together with interest.

On 10 May 2024, Comp S.A. signed Annex No. 1 to the loan agreement dated 14 April 2022 with Polski System Korzyści Sp. z o.o., in which the loan repayment date was extended to 31 December 2024.

On 10 May 2024, Comp S.A. signed Annex No. 1 to the loan agreement dated 28 April 2022 with Polski System Korzyści Sp. z o.o., under which the loan repayment date was extended to 31 December 2024.

On 25 June 2024, Comp S.A. signed with Comp Centrum Innowacji Sp. z o.o. Annex No. 4 to the loan agreement dated 28 June 2019, Annex No. 6 to the loan agreement dated 29 November 2019, Annex No. 5 to the loan agreement dated 12 February 2020, Annex No. 5 to the loan agreement dated 26 February 2020, Annex No. 4 to the loan agreement dated 8 May 2020, Annex No. 3 to the loan agreement dated 19 August 2020, Annex No. 3 to the loan agreement dated 24 September 2020, Annex No. 3 to the loan agreement dated 2 November 2020, Annex No. 3 to the loan agreement dated 30 November 2020, Annex No. 4 to the loan agreement dated 27 January 2021, in which the loan repayment date was extended to 30 June 2025.

On 26 June 2024, Comp S.A. signed Annex No. 1 to the loan agreement dated 17 May 2022 with Polski System Korzyści Sp. z o.o., under which the loan repayment date was extended to 17 May 2025.

On 26 June 2024, Comp S.A. signed Annex No. 1 to the loan agreement dated 30 May 2022 with Polski System Korzyści Sp. z o.o., in which the loan repayment date was extended to 30 May 2025.

On 31 July 2024, Comp S.A. merged with Comp Centrum Innowacji Sp. z o.o. (CCI Sp. z o.o.). As a result of the merger, the Company assumed all the rights and obligations of CCI Sp. z o.o. (universal succession), including offsetting the Company's receivables arising from loans granted against CCI Sp. z o.o. arising from loans received under the loan agreements dated 28 June, 29 November, 20 December 2019, 12 February, 26 February, 21 April, 8 May, 30 June, 19 August, 24 September, 2 November and 30 November 2020, 13 January, 27 January, 11 February, 11 March, 7 April, 7 May, 25 May, 9 June, 7 July, 27 July, 11 August, 25 August, 9 September and 20 October 2021, 4 October 2022, 25 January, 26 April 2023 and 17 January 2024, totalling PLN 86,396,000, and assumed the loans granted by CCI Sp. z o.o. to Comp Platforma Usług S.A. on 20 August 2020, 28 January 2021 and 26 July 2021 in the amount of PLN 3,731 thousand, loans granted to JNJ Limited in the amount of PLN 6,695,000, together with a write-down covering the full amount of the loans plus interest, and a loan granted to Note S.A. in the amount of PLN 3,112,000, together with a write-down covering the full amount of the loan plus interest.

On 31 July 2024, Comp S.A. merged with Polski System Korzyści Sp. z o.o. (PSK Sp. z o.o.). As a result of the merger, the Company assumed all the rights and obligations of PSK Sp. z o.o. (universal succession), including offsetting the Company's receivables arising from loans granted against PSK Sp. z o.o. arising from loans received under the loan agreement dated 27 July 2021, 14 April, 28 April, 17 May, 30 May, 27 July, 7 September, 16 November 2022, 22 May 2023, 14 February and 27 March 2024, in a total amount of PLN 7,630,000.

On 17 September 2024, Comp S.A. granted a loan to NonStop SOC Sp. z o.o. in the amount of PLN 50,000. The repayment date for the loan was set for 17 September 2026. The loan is secured by a blank promissory note "on demand" together with a promissory note declaration.

On 16 October 2024, Comp S.A. granted a loan to Elzab Hellas SPV Sp. z o.o. in the amount of EUR 22,000. The repayment date of the loan was set for 30 June 2025.

On 20 November 2024, Comp S.A. offset the receivable arising from the loan of 26 July 2021 against liabilities to Comp Platforma usług S.A. in the amount of PLN 867,000.

Following the cessation of JNJ Limited's operations and the associated full write-offs (as reported in the 2023 consolidated annual report), Comp decided to wind up JNJ's operations.

Due to the length of the liquidation process and the associated costs, on 9 December 2024 all shares, together with previously written-off intra-Group receivables, were sold within the Comp Capital Group.

On 23 December 2024, Comp S.A. signed Annex No. 7 to the loan agreement of 11 October 2016 with Elzab Hellas SPV Sp. z o.o., in which the loan repayment date was extended to 31 December 2025.

On 10 October 2024, Elzab Hellas SPV Sp. z o.o. granted a loan to Elzab Hellas A.E. in the amount of EUR 9,000 at a variable interest rate. The repayment date was set for 30 June 2025.

On 18 October 2024, Elzab Hellas SPV Sp. z o.o. granted a loan to Elzab Hellas A.E. in the amount of EUR 22,000 at a variable interest rate. The repayment date was set for 30 June 2025.

On 23 December 2024, Elzab Hellas SPV Sp. z o.o. and Elzab Hellas A.E. signed an annex to the loan agreement (contribution in kind) dated 16 December 2022 for EUR 373,000, extending the repayment date to 31 December 2025.

On 11 June 2024, Micra-Metripod KFT granted a loan to Comp Centrum Innowacji Sp. z o.o. in the amount of HUF 120,000,000. The repayment date was set for 2 July 2025. On 31 July 2024, Comp S.A. merged with Comp Centrum Innowacji Sp. z o.o. (CCI Sp. z o.o.). As a result of the merger, the Company assumed all the rights and obligations of CCI Sp. z o.o. (universal succession). After the balance sheet date, on 29 January 2025, Comp S.A. granted a loan to Elzab Hellas SPV Sp. z o.o. in the amount of EUR 80,000. The repayment date for the loan was set for 31 December 2025.

After the balance sheet date, Elzab Hellas SPV Sp. z o.o. granted loans to Elzab Hellas A.E.:

- on 29 January 2025 in the amount of EUR 12,000, with a repayment date of 31 December 2025;
- on 27 February 2025 in the amount of EUR 60,000, with a repayment date of 31 December 2025.

As at the balance sheet date, the loans granted are denominated in PLN and EUR.

Interest rates on loans are based on variable rates linked to WIBOR and EURIBOR.

18. Information on loans granted during the financial year, with particular emphasis on loans granted to entities related to the issuer, specifying at least their amount, type and interest rate, currency and maturity date.

In addition to the intra-Group loans taken out in the current year within the Comp S.A. Capital Group, as mentioned in the point above, a description of loans granted to entities outside the Capital Group is provided below.

<i>as at 31 December 2024</i>	<i>amount of the loan granted</i>	<i>Outstanding amount (including interest) as at the balance sheet date</i>	<i>Maturity date</i>
<i>Loans to individuals</i>			
Short-term:	682	843	
Individual	20	14	31 March 2026
Natural persons	662	829*	past due
Loans from the Company Social Benefits Fund	2,096	1,143	last due 30 August 2028
Total	2,778	1,986	
<i>Business loans</i>			
Long-term:	3,100	3,234	
Note S.A. – agreement dated 14 June 2024	3,100	3,234*	until 31 December 2027
Total	3,100	3,234	
Total loans	5,878	5,220	

* Amount fully covered by a write-down.

On 10 December 2020, JNJ Limited granted a loan to a foreign entity in the amount of EUR 4,053,000, repayable by 31 December 2024 at a fixed interest rate.

Following the cessation of JNJ Limited's operations and the associated full write-offs (as disclosed in the consolidated annual report for 2023), Comp decided to wind up JNJ's operations.

Due to the length of the liquidation process and the associated costs, on 9 December 2024 all shares, together with previously written-off intra-Group receivables, were sold within the Comp Capital Group.

On 14 June 2024, Comp Centrum Innowacji Sp. z o.o. granted a loan to Note S.A. in the amount of PLN 3,100,000. The repayment date was set for 31 December 2027, and the debt was secured by a promissory note. Following the merger of Comp S.A. with Comp Centrum Innowacji Sp. z o.o. on 31 July 2024, Comp S.A. assumed the aforementioned loan.

19. Information on sureties and guarantees granted and received during the financial year, with particular regard to sureties and guarantees granted to entities related to the issuer.

List of active guarantees issued on behalf of Comp S.A.

As at 31 December 2024

No.	Beneficiary	Guarantee No.	Guarantee amount	Validity of guarantee		Guarantee deposits
				from	to	
mBank S.A. – payment guarantees						
1.	ERED 3 Sp. z o.o.	MT49143KPB22	1,272	01/01/2023	31 December 2024	-
2.	PEC Działkowa Sp. z o.o.	MT490045KPB13	902	28 May 2013	31 December 2024	-
mBank S.A. - refund guarantees						
3.	Lloyds Bank	MT49102ZPA18	18	05/06/2018	open-ended	18
mBank S.A. – performance bonds						
4.	Office of the President of the Council Ministers	MT49053KPB20	34	19 March 2020	26 August 2026	7
5.	Wielkopolska Province	MT49190KPB20	14	19 October 2020	23 October 2025	3
6.	City of Ruda Śląska City Council Ruda Śląska	MT49070KPB21	14	14 April 2021	15 April 2026	3
7.	Province West Pomeranian	MT49170KPB21	81	24 September 2021	31 May 2027	16
8.	F.R.B INTER-BUD Sp. z o.o. Ltd.	MT49022KMB22	22	9 March 2022	2 March 2027	4
9.	Provincial Therapy Centre Addictions	MT49035KPB22	29	06/04/2022	8 April 2027	6
10.	Ambulance Station in Ślupsk	MT49034KPB22	14	6 April 2022	8 April 2027	3
11.	COPERNICUS Entity Leczniczy Sp. z o.o.	MT49036KPB22	231	06/04/2022	2 November 2027	46
12.	Specialist Hospital in Prabutach	MT49038KPB22	51	06/04/2022	8 April 2027	10
13.	Pomeranian Hospitals Ltd.	MT49040KPB22	414	06/04/2022	2 November 2027	83
14.	Specialist Hospital in Kościerzyna	MT49039KPB22	80	06/04/2022	4 October 2027	16
15.	Polanki Children's Hospital	MT49037KPB22	43	06/04/2022	2 August 2027	9
16.	Pomeranian Voivodeship	MT49041KPB22	1,187	6 April 2022	8 February 2028	71
17.	Resource Centre Cyberspace	MT49025KPB23	16	08/02/2023	30 June 2028	-
18.	Cavatina GW Sp. z o.o.	MT49100KMB23	10	27 July 2023	25 August 2028	2
19.	Military University of Technology	MT49147KPB23	26	3 October 2023	27 September 2028	5
20.	Lubuskie Province	MT49160KPB23	455	12 October 2023	2 November 2026	-
21.	Orange Polska S.A.	MT38027KPB24	1,287	1 March 2024	30 July 2026	-
22.	Scientific and Academic Network Computer	MT38110KPB24	246	27 May 2024	30 June 2026	-
Total			6,446			302
BNP PARIBAS Bank Polska S.A. - performance bonds						
1.	NiASK	CRD/G/0084581	1,064	02/04/2019	31 December 2024	213
2.	ULC	GW/005488/19	210	12 December 2019	18 May 2026	42
3.	Chief Commander of the Police	GW/005491/19	119	31 December 2019	6 June 2025	24
4.	ULC	GW/000894/20	147	14 February 2020	18 May 2026	29
5.	Chief Commander of the Police	GW/005410/20	50	23 September 2020	31 January 2026	10
6.	PKP Intercity S.A.	CRD/G/0083982	59	21 February 2019	30 June 2026	12
7.	State Treasury - Main Transport Inspectorate Road	GW/004405/21	519	27 August 2021	26 July 2027	104

8.	NASK – National Research Institute	GW/004717/21	13	10 September 2021	15 January 2027	3
9.	Armed Forces of the Armed Forces	GW/005854/21	39	8 November 2021	30 November 2027	8
10.	PERN S.A.	GW/001262/22	227	8 March 2022	31 January 2025	-
11.	PERN S.A.	GW/001311/22	63	09 March 2022	31 July 2025	-
12.	Mental Health Centre in Słupsk	GW/001887/22	20	5 April 2022	8 April 2027	4
13.	Ambulance Station in Gdańsk	GW/001891/22	14	5 April 2022	8 April 2027	3
14.	Hospital for the Mentally and Psychologically Ill	GW/001890/22	68	06/04/2022	2 August 2027	13
15.	Provincial in Słupsk	GW/001889/22	226	06/04/2022	3 September 2027	45
16.	Provincial Psychiatric Hospital	GW/001886/22	61	7 April 2022	8 April 2027	12
17.	Pomeranian Rheumatology Centre in Sopot	GW/001888/22	48	7 April 2022	3 September 2027	10
18.	PERN S.A.	GW/003187/22	50	1 June 2022	28 February 2026	10
19.	Wielkopolska Province	GW/005553/22	582	6 October 2022	30 December 2028	116
20.	PGE Dystrybucja S.A.	GW/001687/23	43	31 March 2023	17 August 2026	28
21.	State Water Management Authority – Polish Waters National Water Management Board	GW/000151/23	300	17 January 2023	31 December 2026	54
22.	IT Centre of the Ministry of Finance	GW/005773/23	18	13 October 2023	30 December 2025	-
23.	Resource Centre Armed Forces Cyberspace	GW/000890/24	135	15 February 2024	4 February 2030	27
24.	PERN S.A.	GW/002779/24	33	8 May 2024	31 July 2027	6
25.	PERN S.A.	GW/002777/24	24	8 May 2024	31 July 2027	5
26.	PERN S.A.	GW/002778/24	12	8 May 2024	31 July 2027	2
27.	Office of Competition and Consumer Protection	GW/003878/24	105	8 July 2024	17 December 2029	21
28.	Ruda Śląska City Council Public Procurement Department	GW/005047/24	63	2 September 2024	13 September 2030	13
29.	Fast Group	CRD/G/0084082	-	-	-	3
30.	Polish Security Printing Works S.A.	GW/005955/24	399	11 October 2024	31 March 2030	80
31.	ERED 3 Sp. z o.o.	GW/007238/24	1,336	13 December 2024	31 December 2025	-
32.	PEC Działkowa Sp. z o.o.	GW/007220/24	944	13 December 2024	31 December 2025	-
BNP PARIBAS Bank Polska S.A. – tender guarantees						
33.	Wielkopolskie Province	GW/005382/24	50	16 September 2024	31 December 2024	-
total			7,041			897
PKO BP S.A. – tender guarantees						
1.	Social Insurance Institution	92102010260000109601906635	650	11 October 2024	27 January 2025	-
2.	Social Insurance Institution	82102010260000149601906619	25	11 October 2024	27 January 2025	-
PKO BP S.A. – performance bonds						
3.	Wrocław University of Technology	69102010260000119601928340	73	02/12/2024	31 January 2030	15
total			748			15

List of active guarantees issued on behalf of companies within the Comp S.A. Group

As at 31 December 2024

No.	Beneficiary	Guarantee No.	Guarantee amount	Validity of guarantee		Guarantee deposits
				from	to	
mBank S.A. – performance bonds						
1.	Provincial Multispecialist Centre for Oncology and Traumatology	MT49052KPB20	199	20 March 2020	20 March 2025	40
2.	SP-CZCSZ	MT49194KPB20	75	23 October 2020	23 October 2025	15
3.	Lower Silesian University in Wroclaw	MT49181KPB20	94	8 October 2020	2 January 2025	19
4.	SP-KGP	MT49201KPB20	37	16 November 2020	16 November 2025	7
5.	NiASK GDP	MT49017KPB21	373	12 February 2021	11 February 2026	75
6.	SP-CZCSZ	MT49146KPB21	7	30 August 2021	15 November 2025	1
7.	PIG-PIB	MT49149KPB21	11	06/09/2021	15 July 2026	2
8.	Warsaw Trams	MT49173KPB21	594	30 September 2021	30 September 2026	119
9.	SP-CIRF	MT49179KPB21	38	14 October 2021	18 October 2026	8
10.	SP-CIRF	MT49180KPB21	93	14 October 2021	18 October 2026	19
11.	Hospitals in Greater Poland	MT49189KPB21	34	15 November 2021	5 July 2025	7
12.	ZUS	MT49199KPB21	84	1 December 2021	31 January 2025	17
13.	NBP	MT49200KPB21	135	3 December 2021	31 January 2025	27
14.	Poczta Polska	MT49206KPB21	1,076	17 December 2021	30 March 2026	215
15.	SP-CZCSZ	MT49007KPB22	390	21 January 2022	27 February 2025	78
16.	SP-MS	MT49053KPB22	7,892	31 May 2022	31 March 2027	877
17.	SP-CZCSZ	MT49133KPB22	1,995	28 November 2022	31 December 2026	1,083
18.	SP-CZCSZ	MT49134KPB22	1,560	28 November 2022	31 December 2026	-
19.	SP-CZCSZ	MT49135KPB22	6,191	28 November 2022	31 December 2026	-
20.	PKP PLK S.A.	MT49121KPB23	22	30 August 2023	10 December 2026	4
21.	Wroclaw Court of Appeal	MT49137KPB23	198	25 September 2023	29 June 2029	40
22.	SP-KGP	MT49196KPB23	197	14 December 2023	20 January 2027	39
23.	Ministry of Justice of Armenia	MT49201ZPB23	109	19 December 2023	5 May 2025	-
24.	Ministry of Justice of Armenia	MT49206ZPB23	103	19 December 2023	5 May 2025	-
25.	SP-CZCSZ	MT38011KPB24	1,979	15 February 2024	12 February 2029	396
26.	SP-CZCSZ	MT38014KPB24	1,237	15 February 2024	12 February 2029	248
27.	Central IT Centre	MT38291KPB24	199	7 November 2024	15 November 2026	-
28.	Bank Millenium S.A.	MT38350KPB24	250	23 December 2024	30 November 2027	-
29.	PWPW S.A.	MT38351KPB24	50	23 December 2024	31 March 2026	-
Total			25,222			3,336

ERSTE Bank plc. – payment guarantee

1.	ÚjbudaOne Logisztikai Park Kft.	-	32	-	31 December 2025	32
Total			32			32

TU Euler Hermes – performance bonds

1.	PKP PLK S.A.	57256	57	02/02/2024	02/01/2025	-
2.	Military Counter-Intelligence Service	57447	71	6 March 2024	16 January 2026	-

3.	KGP	57450	14	7 March 2024	24 May 2027	-
4.	Civil Aviation Authority	57750	80	30 April 2024	11 September 2028	-
5.	SP-CZCSZ	57795	285	9 May 2024	25 January 2030	-
6.	ZUS	58351	51	21 August 2024	21 September 2028	-
7.	SP-CZCSZ	58299	326	8 August 2024	5 November 2027	-
8.	SP-CZCSZ	58295	1,077	8 August 2024	16 April 2030	-
9.	PKP PLK S.A.	58401	46	28 August 2024	4 October 2027	-
10	KGP	58476	502	9 September 2024	23 November 2026	-
11.	NBP	58655	154	14 October 2024	31 January 2028	-
12.	PAŻP	58816	619	8 November 2024	15 January 2029	-
13	KGP	58849	819	14 November 2024	8 February 2028	-
14.	ZUS	59020	132	16 December 2024	1 February 2027	-
Total			4,233			-

TU Euler Hermes – tender bonds

1.	MRiT	58736	35	24 October 2024	18 February 2025	-
2.	KGP	58708	20	21 October 2024	17 February 2025	-
3.	CIRF	58757	30	28 October 2024	28 February 2025	-
Total			85			-

Bank Pekao S.A. – performance bonds

1.	SP-MF	BOFH20022160GP/K	78	30 October 2020	06/01/2025	52
2.	SP-CZCSZ	BOFH20022525GP/K	132	2 December 2020	31 August 2027	88
3.	CIRF	BOFH20022651GP/K	49	28 December 2020	15 February 2025	33
4.	SP-KGP	BOFH21025498GP/K	314	4 October 2021	14 February 2025	209
5.	Gdańsk University of Technology	BFH22027807GP/K	64	18 May 2022	7 January 2026	42
6.	SP-CZCSZ	BFH22027959GP/W	90	26 May 2022	16 November 2026	60
7.	SP-KGP	BFH22028218GP/K	257	22 June 2022	20 June 2027	171
8.	ZUS	BFH22028458GP/K	19	08 July 2022	07.08.2025	4
9.	SP-CZCSZ	BFH22028590GP/K	33	19 July 2022	19 December 2026	-
10.	NFZ	BFH22030387GP/K	20	30 December 2022	31 January 2025	2
11	Bank Millennium S.A.	BFH23030998GP/K	20	28 February 2023	2 January 2025	-
12	NBP	BFH23032748GP/W	19	24 July 2023	28 December 2026	-
13	University of Rzeszów	BFH23033248GP/K	35	11 September 2023	08/02/2027	23
14	SP-CZCSZ	BFH23033444GP/K	45	26 September 2023	23 January 2026	-
15	SP-CZCSZ	BFH23033432GP/W	6	26 September 2023	23 January 2026	2
16	SP-CZCSZ	BFH23033406GP/W	11	27 September 2023	15 June 2026	4
17	SP-CZCSZ	BFH23033428GP/W	10	27 September 2023	16 June 2026	4
18	Ministry of the Interior and Administration	BFH23033590GP/K	57	13 October 2023	30 December 2026	11
19	SP KGP	BFH23033847GP/K	54	10 November 2023	1 July 2026	5
20.	SP-CZCSZ	BFH23033915GP/K	84	7 November 2023	26 December 2026	56
21	SP-CZCSZ	BFH23034131GP/K	134	24 November 2023	30 January 2025	13
22	SP- KGP	BFH23034299GP/K	36	18 December 2023	20 January 2027	7
23	SP- KGP	BFH23033559GP/K	74	20 December 2023	21 June 2027	49
24	SP-CZCSZ	BFH24034843GP/K	822	31 January 2024	3 April 2027	165
25	SP- KGP	BFH24034777GP/K	178	26 January 2024	17 April 2026	18

26 ZUS BFH24035554GP/K 1,288 12 April 2024 26 May 2028 258

27.	SP-CZCSZ	BFH24037142GP/K	604	16 October 2024	29 March 2028	121
28.	PKP Intercity	BFH24037200GP/K	486	22 October 2024	23 December 2027	97
29.	SP-CZCSZ	BFH24037305GP/K	406	8 November 2024	07/01/2028	81
30.	SP-CZCSZ	BFH24037383GP/K	166	13 November 2024	11 February 2028	33
Total			5,591			1,609

Bank Pekao S.A. – tender guarantees

1.	SP-KGP	BFH24036897GP/K	300	05/09/2024	03/01/2025	-
2.	Central IT Centre	BFH24036967GP/K	30	18 September 2024	6 January 2025	-
3.	ZUS	BFH24036992GP/K	30	30 September 2024	18 January 2025	-
Total			360			-

Bank Pekao S.A. – advance repayment guarantee

1.	SP-KGP	BFH24037510GP/K	15,427	5 December 2024	13 January 2025	-
Total			15,427			-

Ameriabank – performance bonds

1.	Ministry of Justice of Armenia	O.AB.100.12CIB.PIED.0.14559.24	92	09/08/2024	29 January 2026	92
2.	Ministry of Justice of Armenia	O.AB.100.12CIB.PIED.0.14560.24	275	09/08/2024	29 January 2025	275
3.	Ministry of Justice of Armenia	O.AB.100.12CIB.PIED.0.18357.24	229	24 September 2024	30 March 2026	229
4.	Ministry of Justice of Armenia	O.AB.100.12CIB.PIED.0.18360.24	703	3 October 2024	31 March 2025	422
Total			1,299			1,018

List of guarantees issued by the Comp S.A. Group

As at 31 December 2024

No.	Beneficiary	Type of liability	Amount of the liability	Expiry date of the liability
1.	TD SYNEX Poland Sp. z o.o.	Amount due in respect of debt arising from orders placed - Enigma Information Security Systems Ltd	67,000	31 August 2025
Total			67,000	

After the balance sheet date, on 21 February 2025, TD SYNEX Poland Sp. z o.o. issued a statement that, as of 21 February 2025, it was releasing the legal security for the repayment of the debt in the form of a civil guarantee granted by Comp S.A. in favour of Enigma Systemy Ochrony Informacji Sp. z o.o.

20. In the event of a securities issue during the reporting period – a description of the issuer’s use of the proceeds from the issue up to the date of preparation of the management report.

As at the date of publication, the Group has no liabilities arising from the issue of debt securities (including bonds).

21. Explanation of the differences between the financial results disclosed in the annual report and the previously published forecasts for the year in question.

The company published its earnings estimates (EBITDA) for 2024 in a current report dated 29 July 2022. “The strategy for the Comp Capital Group entitled ‘COMP 2025 Next Generation for 2022–2025’, as well as an update to the parameters of the COMP 2025 Next Generation strategy (Report 44/2024 dated 26 November 2024

). The financial results presented in the annual report are consistent with the information contained in current report No. 44/2024.

22. An assessment of the feasibility of implementing investment plans, including capital investments, in relation to the amount of funds available, taking into account possible changes in the financing structure of these activities.

The Company has no plans in the near future to undertake investments that exceed its financing capacity.

The Company undertakes investments related to the development of new products and capabilities, financing them on an ongoing basis from its own funds or external sources.

23. Assessment of factors and unusual events affecting the operating result for the financial year, specifying the extent of the impact of these factors or unusual events on the result achieved.

No unusual events affecting the operating result for the financial year occurred other than those described in the Financial Statements.

24. Characteristics of external and internal factors significant for the issuer's development and a description of the prospects for the development of the issuer's business at least until the end of the financial year following the financial year for which the financial statements included in the annual report were prepared, taking into account elements of the market strategy developed by the issuer.

In 2025, the business activities of Comp S.A. and the Group companies will be conducted primarily as a continuation of the main strategic development directions from previous years.

The Comp S.A. Group will focus on operations in several attractive market niches, building on its unique capabilities and the high barriers to entry in each of them:

- electronic and IT security, forming the core of the IT segment;
- services for small and medium-sized enterprises and the manufacture of fiscal devices, which form the core of the retail segment.

The Group views the external conditions in each of its main business niches as favourable: in the field of cybersecurity, including specialised security, the further development of online fiscalisation, and opportunities for the development of value-added services for small and medium-sized retailers.

The factors that will influence the results for 2025 are:

- The continuation and implementation of new commercial projects in the IT segment, primarily in the field of ICT security. Orders are being fulfilled for the supply of security products and services to the Ministry of Defence and a number of major companies in the energy, industrial and financial sectors. As at the date of this report, the Group is participating at various stages of tender procedures and plans to take part in a number of projects, including those conducted under public procurement law, which are scheduled for completion in 2025.
- Further development of the M/platform project (scaling up operational activities, generating new products/services), also through the companies of the Comp S.A. Capital Group; in the Company's view, this project is set to become one of the Group's leading business lines in the coming years.
- Utilising export markets as an alternative source of revenue to domestic sales, including contracts for fiscal devices, for example to Kenya, and securing new markets for other solutions developed by the Comp S.A. Capital Group, including the M/platform project and the Electronic Surveillance System.
- Further development of SaaS services offered on a subscription basis.
- Development of managed services related to security monitoring (so-called SOC).

25. Changes to the fundamental principles of managing the issuer and its capital group.

In 2024, the Company did not make any significant changes to the principles of managing the business and the Capital Group.

Discontinued operations

Within the Comp Centrum Innowacji Sp. z o.o. Group

Based on a review of product lines and market analysis, as reported in Current Report No. 34/2023 dated 29 September 2023, and following the conclusion of an agreement with the Eurocash Group on 14 December 2023, the Company's Management Board decided to further develop value-added services based on M/platform technology exclusively in close cooperation with strategic partners who are leaders in the relevant market segment, possess their own distribution centres and have well-developed retail networks.

The model of strategic cooperation with a market partner in this area will limit our investments and the risks associated with building our own position, thereby strengthening our plans to achieve our objectives, including, above all, growing EBITDA and transfer levels by the end of the COMP 2025 Next Generation strategy.

This move represents the implementation of the COMP 2025 Next Generation strategy, as outlined in Current Report No. 29/2022 of 29 July 2022 concerning the sale of services on multifunctional devices, with a view to making greater use of clients' multi-year budgets and achieving a high conversion of revenue growth into EBITDA growth. In Poland, the Eurocash Group is the leading FMCG player in the largest retail market segment, and together with them we will continue to intensively develop our value-added services related to promotions and transaction data processed on fiscal devices, further expanding their scope to include payment infrastructure and e-receipts, the importance of which in our total subscription revenue will grow significantly in the coming years. The model has been proven, and the recent agreement with the Eurocash Group marks the next stage in strengthening our business relationship, building on the highly beneficial experiences for both companies in 2023.

In 2024, we implemented a model of strategic cooperation with market leaders (the Eurocash Group). Given the strong trend towards the expansion of retail chains, including franchise networks, this model is not only optimal in terms of revenue and costs.

The introduction of the strategic cooperation model with market leaders led to the discontinuation of activities based on the previous model. Consequently, this meant ceasing operations in foreign markets regarding the implementation of the M/platform project, which developed value-added services intended mainly for distributors, manufacturers and independent shops. Discontinuing operations in an unpromising and less effective segment represents the implementation of the COMP 2025 Next Generation strategy in terms of optimising assets that are no longer priorities for strategic development and avoiding further high expenditure on building a market position in other countries (with higher risk).

JNJ Limited

Following the discontinuation of JNJ Limited's operations and the associated full write-offs (as disclosed in the consolidated annual report for 2023), Comp decided to wind up JNJ's operations.

Due to the length of the liquidation process and the associated costs, on 9 December 2024 all shares, together with previously written-off intra-Group receivables, were sold within the Comp Capital Group.

At Comp S.A.

In the second half of 2022, Comp S.A. sold an organised part of the business (OPB) – the System Solutions Division – to its subsidiary Enigma Systemy Ochrony Informacji Sp. z o.o. Some of the commercial contracts forming part of the OPB could not be formally transferred due to a lack of consent from the counterparties. In 2024, Comp S.A. recognised the revenue and costs associated with these contracts as part of discontinued operations, taking into account the transfer of the economic effects of the transaction to the company acquiring the OPE.

REVENUE, COSTS AND RESULT FROM DISCONTINUED OPERATIONS	2024 current period from 01/01/2024 to 31.12.2024	2023 comparable period from 01/01/2023 to 31 December 2023
Total revenue	7,499	50,239
Total costs	7,499	50,239
Income tax	-	-
Profit/(Loss) for the financial year on discontinued operations	-	-

In 2024, cash flows relating to discontinued operations relate entirely to cash flows from operating activities. The net cash flow from discontinued operations for 2024 amounts to 0.

The above event has no impact on these Consolidated Financial Statements of Comp S.A.

26. Any agreements entered into between the issuer and members of management providing for compensation in the event of their resignation or dismissal from their position without just cause, or where their dismissal or removal occurs as a result of a merger of the issuer through acquisition.

In the event of dismissal from their position without just cause, members of the management board of Comp S.A. – performing their duties under an employment contract – are entitled to compensation amounting to 12 times their average monthly salary.

27. The value of remuneration, awards or benefits, including those arising from incentive or bonus schemes based on the issuer's equity, including schemes based on senior bonds, convertible bonds or subscription warrants (in cash, in kind or in any other form), paid, due or potentially due, separately for each member of the issuer's management, supervisory or administrative bodies, regardless of whether they were charged to expenses or resulted from profit distribution; where the issuer is a parent entity, a significant investor, a partner in a jointly controlled entity or, as the case may be, an entity party to a joint contractual arrangement – separate information on the value of remuneration and awards received for performing functions on the governing bodies of subordinate entities.

The Company has not introduced any incentive schemes based on the Company's capital.

Remuneration, bonuses and the value of benefits paid to the management and supervisory staff of the Parent Company in 2024

Remuneration paid to the management and supervisory staff of Comp S.A. for performing functions on the company's governing bodies amounted to, respectively:

2024 current period from 01/01/2024 to 31/12/2024	remuneration under an employment contract	bonuses	remuneration under and management contracts	other benefits
Robert Tomaszewski – Chairman of the Management Board	1,833	1,342	-	48
Krzysztof Morawski – Deputy Chairman of the Management Board	960	720	-	45
Jaroslav Wilk – Deputy Chairman of the Management Board	960	720	-	36
Andrzej Wawer – Deputy Chairman of the Management Board	936	702	-	36
Management Board	4,689	3,484	-	165

Grzegorz Należyty – Chairman of the Supervisory Board	-	-	295	4
Ryszard Trepczyński – Vice-Chairman of the Supervisory Board	-	-	204	-
Krystian Brymora – Member of the Supervisory Board	-	-	153	2
Piotr Nowjalis – Member of the Supervisory Board (until 6 December 2024)	-	-	186	3
Julian Kutrzeba – Member of the Supervisory Board	-	-	153	-
Szczepan Strublewski – Member of the Supervisory Board	-	-	156	-
Piotr Kwaśniewski – Member of the Supervisory Board (since 6 December 2024)	-	-	8	-
Supervisory Board	-	-	1,155	9

<i>2023 comparable period from 01/01/2023 to 31/12/2023</i>	<i>remuneration under an employment contract</i>	<i>bonuses</i>	<i>remuneration under and management contracts</i>	<i>other benefits</i>
Robert Tomaszewski – Chairman of the Management Board	1,790	844	-	39
Krzysztof Morawski – Deputy Chairman of the Management Board	960	416	-	39
Jarosław Wilk – Deputy Chairman of the Management Board	960	416	-	25
Andrzej Wawer – Deputy Chairman of the Management Board	936	410	-	37
Management Board	4,646	2,086	-	140
Grzegorz Należyty – Chairman of the Supervisory Board	-	-	260	4
Ryszard Trepczyński – Vice-Chairman of the Supervisory Board	-	-	177	-
Krystian Brymora - Member of the Supervisory Board	-	-	115	2
Jerzy Radosław Bartosiewicz – Member of the Supervisory Board (until 30 June 2023)	-	-	88	-
Piotr Nowjalis – Member of the Supervisory Board	-	-	181	3
Julian Kutrzeba – Member of the Supervisory Board	-	-	135	-
Szczepan Strublewski – Member of the Supervisory Board (since 30 June 2023)	-	-	63	-
Supervisory Board	-	-	1,019	9

28. Information on any liabilities arising from pensions and similar benefits for former members of management, supervisory bodies or administrative bodies, and on liabilities incurred in connection with such pensions, specifying the total amount for each category of body; if the relevant information has been presented in the financial statements

In 2024, there were no liabilities arising from pensions and similar benefits for former management, supervisory or administrative body members, nor were there any liabilities incurred in connection with such pensions.

29. Specification of the total number and nominal value of all shares of the issuer and shares in entities related to the issuer held by the issuer's management and supervisory personnel (separately for each person).

List of Comp S.A. shares held by Comp S.A.'s management and supervisory personnel as at the balance sheet date of 31 December 2024.

First name and surname	Position at Comp S.A.	Number of shares held	Total nominal value of shares (PLN)	Share in the share capital (%)	Share of total votes at the AGM (%)
Grzegorz Należyty	Chairman of the Supervisory Board	-	-	-	-
Ryszard Trepczyński	Vice-Chairman of the Supervisory Board	-	-	-	-
Szczepan Strublewski	Member of the Supervisory Board	-	-	-	-
Julian Kutrzeba	Member of the Supervisory Board	-	-	-	-
Krzystian Brymora	Member of the Supervisory Board	-	-	-	-
Piotr Kwaśniewski*	Member of the Supervisory Board	-	-	-	-
Robert Tomaszewski**	Chairman of the Board	2,007	5,017.50	0.444%	0.444%
		241,931	604,827.50	5.354%	5.354%
Krzysztof Morawski	Deputy Chairman of the Management Board	-	-	-	-
Andrzej Wawer	Deputy Chairman of the Management Board	1,780	4,450.00	0.039%	0.039%
Jarosław Wilk	Deputy Chairman of the Management Board	3,150	7,875.0	0.0697%	0.0697%

* Piotr Kwaśniewski was appointed by the Annual General Meeting of Comp S.A. as a member of the Supervisory Board of Comp S.A. on 6 December 2024.

** As at the date of publication of this report, Robert Tomaszewski holds:

– directly, 2,007 ordinary bearer shares, representing 0.0444% of the share capital and corresponding to 2,007 votes, representing 0.0444% of the total number of votes at the general meeting of Comp S.A.;

– indirectly, through CE Management Group Sp. z o.o., 241,931 ordinary bearer shares, representing 5.3544% of the share capital and corresponding to 241,931 votes, representing 5.3544% of the total number of votes at the general meeting of Comp S.A.;

List of Comp S.A. shares held by the management and supervisory staff of Comp S.A. as at the date of publication of this report.

First name and surname	Position at Comp S.A.	Number of shares held	Total nominal value of shares (PLN)	Share in the share capital (%)	Percentage of total votes at the General Meeting (%)
Grzegorz Należyty	Chairman of the Supervisory Board	-	-	-	-
Ryszard Trepczyński	Vice-Chairman of the Supervisory Board	-	-	-	-
Szczepan Strublewski	Member of the Supervisory Board	-	-	-	-
Julian Kutrzeba	Member of the Supervisory Board	-	-	-	-
Krzystian Brymora	Member of the Supervisory Board	-	-	-	-
Piotr Kwaśniewski*	Member of the Supervisory Board	-	-	-	-
Robert Tomaszewski**	Chairman of the Board	2,007	5,017.50	0.444%	0.444%
		234,001	585,002.50	5.179%	5.179%
Krzysztof Morawski	Deputy Chairman of the Management Board	-	-	-	-
Andrzej Wawer	Deputy Chairman of the Management Board	1,780	4,450.00	0.039%	0.039%
Jarosław Wilk	Deputy Chairman of the Management Board	3,003	7,507.50	0.067%	0.067%

* Piotr Kwaśniewski was appointed by the Ordinary General Meeting of Comp S.A. as a member of the Supervisory Board of Comp S.A. on 6 December 2024.

** As at the date of publication of this report, Robert Tomaszewski holds:

– directly, 2,007 ordinary bearer shares, representing 0.0444% of the share capital and corresponding to 2,007 votes, representing 0.0444% of the total number of votes at the general meeting of Comp S.A.;

– indirectly, through CE Management Group Sp. z o.o., 234,001 ordinary bearer shares, representing 5.1789% of the share capital and corresponding to 234,001 votes, representing 5.1789% of the total number of votes at the general meeting of Comp S.A.;

- **Robert Tomaszewski**

As at the balance sheet date of 31 December 2024

The Management Board of Comp S.A. has announced that on 28 February 2024 the Company received a notification of the acquisition of shares in Comp S.A., submitted pursuant to Article 19(1) of the MAR Regulation by a person closely associated with Mr Robert Tomaszewski, the President of the Management Board, who holds a management position in the Company.

As a result of the acquisition of 8,000 shares in the Company by CE Management Group Sp. z o.o. on 26 February 2024, which the Management Board of Comp S.A. reported in Current Report No. 9/2024 dated 28 February 2024, the indirect shareholding of shareholder Mr Robert Tomaszewski in the Company's share capital has changed.

These changes are described in the table below.

Entity	Number of shares prior to the share acquisition	% shareholding in the share capital prior to the share acquisition	Number of votes prior to the share acquisition	Percentage of votes out of the total number of votes prior to the share acquisition	Number of shares following the share acquisition	% share of shares in the share capital following the share acquisition	Number of votes following the share acquisition	% share of votes in the total number of votes following the share acquisition
Robert Tomaszewski*	275,856	5.05%	275,856	5.05%	283,856	5.20%	283,856	5.20%

* As at 26 February 2024, Robert Tomaszewski held:

– directly, 2,068 ordinary bearer shares, representing 0.038% of the share capital and corresponding to 2,068 votes, representing 0.038% of the total number of votes at the general meeting of Comp S.A.;

– indirectly through CE Management Group Sp. z o.o., 281,788 ordinary bearer shares, representing 5.16% of the share capital and corresponding to 281,788 votes, representing 5.16% of the total number of votes at the general meeting of Comp S.A.

The Management Board of Comp S.A. announced that on 18 March 2024 the Company received a notification of the sale of Comp S.A. shares submitted pursuant to Article 19(1) of the MAR Regulation by a person holding a management position in the Company, namely Mr Robert Tomaszewski, acting as Chairman of the Management Board.

As a result of the sale of 61 shares in the Company by Robert Tomaszewski on 15 March 2024, which the Management Board of Comp S.A. reported in Current Report No. 13/2024 dated 18 March 2024, the direct shareholding of shareholder Mr Robert Tomaszewski in the Company's share capital has changed.

Details of the transaction are set out in the tables below.

Notification of a transaction involving shares in Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % in the Shareholder Register
Robert Tomaszewski*	sale of shares	15 March 2024	61	0.001%

Shareholder	Position prior to the transaction			Status after the transaction			Current report	
	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % of voting rights	% of votes at the AGM	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % on the Board of Directors	% of votes at the AGM	Report number	Date of report publication
Robert Tomaszewski*	2,068	0.038%	0.038%	2,007	0.037%	0.037%	13/2024	18 March 2024

* As at 15 March 2024, Robert Tomaszewski held:

– directly, 2,007 ordinary bearer shares, representing 0.037% of the share capital and corresponding to 2,007 votes, representing 0.037% of the total number of votes at the general meeting of Comp S.A.;

– indirectly, through CE Management Group Sp. z o.o., 281,788 ordinary bearer shares, representing 5.16% of the share capital and corresponding to 281,788 votes, representing 5.16% of the total number of votes at the general meeting of Comp S.A.

Indirect and direct shareholding

Entity	Number of shares prior to the share disposal	% share of shares in the share capital prior to the disposal	Number of votes prior to the share disposal	% of votes in the total number of votes prior to the disposal of shares	Number of shares after the disposal	Percentage of shares in the share capital following the disposal of shares	Number of votes following the disposal of shares	% of votes in the total number of votes following the disposal of shares
Robert Tomaszewski*	283,856	5.20%	283,856	5.20%	283,795	5.20%	283,795	5.20%

* As at 15 March 2024, Robert Tomaszewski held:

– directly held 2,007 ordinary bearer shares, representing 0.037% of the share capital and corresponding to 2,007 votes, representing 0.037% of the total number of votes at the general meeting of Comp S.A.;

– indirectly, through CE Management Group Sp. z o.o., 281,788 ordinary bearer shares, representing 5.16% of the share capital and corresponding to 281,788 votes, representing 5.16% of the total number of votes at the general meeting of Comp S.A.

The Management Board of Comp S.A. has announced that on 18 March 2024 the Company received a notification of the sale of Comp S.A. shares submitted pursuant to Article 19(1) of the MAR Regulation by a person closely associated with Mr Robert Tomaszewski, the President of the Management Board, who holds a management position within the Company.

As a result of the sale of 8,259 shares in the Company by CE Management Group Sp. z o.o. on 15 March 2024, which the Management Board of Comp S.A. reported in Current Report No. 14/2024 dated 18 March 2024, the indirect shareholding of shareholder Mr Robert Tomaszewski in the Company's share capital has changed.

These changes are described in the table below.

Entity	Number of shares prior to the share acquisition	% shareholding in the share capital prior to the share acquisition	Number of votes prior to the share acquisition	% of total votes prior to the share acquisition	Number of shares following the share acquisition	% share of shares in the share capital following the share acquisition	Number of votes following the share acquisition	Percentage of votes in the total number of votes following the share acquisition
Robert Tomaszewski*	283,795	5.20%	283,795	5.20%	275,536	5.04%	275,536	5.04%

* As at 18 March 2024, Robert Tomaszewski held:

– directly 2,007 ordinary bearer shares, representing 0.037% of the share capital and corresponding to 2,007 votes, representing 0.037% of the total number of votes at the general meeting of Comp S.A.;

– indirectly through CE Management Group Sp. z o.o., 273,529 ordinary bearer shares, representing 5.01% of the share capital and corresponding to 273,529 votes, constituting 5.01% of the total number of votes at the general meeting of Comp S.A.

The Management Board of Comp S.A. announced in current report No. 32/2024 on 31 July 2024 a reduction in the Company's share capital.

Detailed information in this regard is contained in the financial statements in the section "Shareholding structure of Comp S.A. as at the date of publication of this report, broken down by the number of shares and the votes attached thereto" in the section concerning Comp S.A.

The reduction of the Company's share capital, and consequently the reduction in the number of shares, had a direct impact on the change in the shareholding of Mr Robert Tomaszewski, who acts as Chairman of the Management Board of Comp S.A., in his percentage shareholding in the share capital and his percentage share of votes in the total number of votes.

These changes are described in the table below.

Entity	Number of shares prior to the share redemption and share capital reduction	Percentage of shares in the share capital prior to the share redemption and reduction of the share capital	Number of votes prior to the share redemption and reduction of the share capital*	% of votes in the total number of votes prior to the share redemption and share capital reduction	Number of shares following the share redemption and reduction of the share capital	% share of shares in the share capital following the share redemption and reduction of the share capital	Number of votes following the share redemption and reduction of the share capital	% of votes as a proportion of the total number of votes following the share cancellation and reduction of the share capital
Robert Tomaszewski*	275,536	5.04%	275,536	5.04%	275,536	6.10%	275,536	6.10%

* As at 31 July 2024, Robert Tomaszewski held:

– directly, 2,007 ordinary bearer shares, representing 0.044% of the share capital and corresponding to 2,007 votes, representing 0.044% of the total number of votes at the general meeting of Comp S.A.;

– indirectly, through CE Management Group Sp. z o.o., 273,529 ordinary bearer shares, representing 6.054% of the share capital and corresponding to 273,529 votes, representing 6.054% of the total number of votes at the general meeting of Comp S.A.

The Management Board of Comp S.A. has announced that on 17 December 2024 the Company received a notification of the sale of Comp S.A. shares submitted pursuant to Article 19(1) of the MAR Regulation by a person closely associated with Mr Robert Tomaszewski, the President of the Management Board, who holds a management position within the Company.

As a result of the sale of 31,598 shares in the Company by CE Management Group Sp. z o.o. on 16 December 2024, which the Management Board of Comp S.A. reported in Current Report No. 52/2024 of 17 December 2024, the indirect shareholding of Mr Robert Tomaszewski in the Company's share capital has changed.

These changes are described in the table below.

Entity	Number of shares prior to the share acquisition	Percentage of shares in the share capital prior to the share acquisition	Number of votes prior to the share acquisition	% of votes in the total number of votes prior to the share acquisition	Number of shares following the share acquisition	% share of shares in the share capital after the share acquisition	Number of votes following the share acquisition	Percentage of votes in the total number of votes after the share acquisition
Robert Tomaszewski*	275,536	6.10%	275,536	6.10%	243,938	5.50%	243,938	5.50%

* As at 17 December 2024, Robert Tomaszewski held:

– directly, 2,007 ordinary bearer shares, representing 0.0444% of the share capital and corresponding to 2,007 votes, representing 0.0444% of the total number of votes at the general meeting of Comp S.A.;

– indirectly, through CE Management Group Sp. z o.o., 241,931 ordinary bearer shares, representing 5.3544% of the share capital and corresponding to 241,931 votes, representing 5.3544% of the total number of votes at the general meeting of Comp S.A.

As at the date of publication of this report

To the best of the Company's Management Board's knowledge, as at the date of publication of this report, the following changes have occurred in the number of shares held by the shareholder Mr Robert Tomaszewski.

The Management Board of Comp S.A. has announced that on 7 March 2025 the Company received a notification of the sale of Comp S.A. shares submitted pursuant to Article 19(1) of the MAR Regulation by a person closely associated with Mr Robert Tomaszewski, the President of the Management Board, who holds a management position within the Company.

As a result of the sale of 7,930 shares in the Company by CE Management Group Sp. z o.o. on 7 March 2025, as reported by the Management Board of Comp S.A. in Current Report No. 6/2025 of 7 March 2025, the indirect shareholding of shareholder Mr Robert Tomaszewski in the Company's share capital has changed.

These changes are described in the table below.

Notification of a transaction involving shares in Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % in the Shareholders' Register
CE Management Sp. z o.o.*	sale of shares	07/03/2025	7,930	0.176%

Shareholder	Position prior to the transaction			Status after the transaction			Current report	
	Number of shares / number of votes at the AGM	% of total shares and % on the Board of Directors	% of votes at the AGM	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % on the Board of Directors	% of votes at the AGM	Report number	Date of report publication
Robert Tomaszewski*	243,938	5.40%	5.40%	236,008	5.22%	5.22%	6/2025	7 March 2025

* Robert Tomaszewski holds:

– directly 2,007 ordinary bearer shares, representing 0.037% of the share capital and corresponding to 2,007 votes, representing 0.037% of the total number of votes at the general meeting of Comp S.A.;

– indirectly through CE Management Group Sp. z o.o., 234,001 ordinary bearer shares, representing 5.18% of the share capital and corresponding to 234,001 votes, representing 5.18% of the total number of votes at the general meeting of Comp S.A.

- **Andrzej Wawer**

As at the balance sheet date of 31 December 2024

The reduction in the Company's share capital, and consequently the reduction in the number of shares, had a direct impact on the change in Mr Andrzej Wawer's percentage shareholding in the share capital and his percentage share of votes in the total number of votes. The Management Board of Comp S.A. announced the reduction of the Company's share capital in Current Report No. 32/2024 on 31 July 2024. Details of the changes are set out in the table below:

Entity	Number of shares prior to the share redemption and reduction of the share capital by	% share of shares in the share capital prior to the share redemption and share capital reduction	The number of votes prior to the share cancellation and the reduction of the share capital by	% of votes in the total number of votes prior to the share redemption and share capital reduction	Number of shares following the share redemption and reduction of the share capital by	% share of shares in the share capital following the share redemption and reduction of the share capital	Number of votes following the share redemption and reduction of the share capital by	% of votes as a proportion of the total number of votes following the share cancellation and reduction of the share capital
Andrzej Wawer	1,780	0.033%	1,780	0.033%	1,780	0.039%	1,780	0.039%

As at the date of publication of this report

To the best of the Company's Management Board's knowledge, as at the date of publication of this report, there have been no changes in the number of shares held by the shareholder Mr Andrzej Wawer.

- **Jaroslław Wilk**

As at the balance sheet date of 31 December 2024

On 18 March 2024, the Company received a notification of the sale of shares from shareholder Mr Jaroslław Wilk, who holds a management position as Vice-President of the Management Board of Comp S.A. The Management Board of Comp S.A. reported the above change in current report No. 12/2024 dated 18 March 2024.

The details of the transaction are set out in the tables below.

Notice of a transaction involving shares in Comp S.A.				
Shareholder	Type of transaction	Date of transaction	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % of voting rights
Jaroslaw Wilk	Sale of shares	15 March 2024	96	0.002%

Shareholder	Position prior to the transaction			Status after the transaction			Current report	
	Number of shares (units) / number of votes at the AGM (units)	% of total shares and % of voting rights	% of votes at the AGM	Number of shares / number of votes at the AGM	% of total shares and % on the Board of Directors	% of votes at the AGM	Report number	Date of report publication
Jaroslaw Wilk	3,246	0.059%	0.059%	3,150	0.058%	0.058%	12/2024	18 March 2024

The reduction in the Company's share capital, and consequently the reduction in the number of shares, had a direct impact on the change in Mr Jaroslaw Wilk's percentage shareholding in the share capital and his percentage share of votes in the total number of votes.

The Management Board of Comp S.A. announced the reduction of the Company's share capital in Current Report No. 32/2024 on 31 July 2024.

Details of the changes are set out in the table below:

Entity	Number of shares prior to the share redemption and reduction of the share capital by	% share of shares in the share capital prior to the share redemption and share capital reduction	The number of votes prior to the share cancellation and the reduction of the share capital by	% of votes in the total number of votes prior to the share redemption and share capital reduction	Number of shares following the share redemption and reduction of the share capital by	% share of shares in the share capital following the share redemption and reduction of the share capital	Number of votes following the share redemption and reduction of the share capital by	% of votes out of the total number of votes following the share cancellation and reduction of the share capital
Jaroslaw Wilk	3,150	0.058%	3,150	0.058%	3,150	0.070%	3,150	0.070%

On 16 December 2024, Mr Jaroslaw Wilk sold 147 shares in the Company in response to the invitation to sell shares dated 29 November 2024 announced by the Company (as disclosed by the Company in Current Report No. 45/2024 of 29 November 2024). Mr Jaroslaw Wilk availed himself of the exemption from the obligation to notify the Company pursuant to Article 19(8) of the MAR, as amended with effect from 14 November 2024 by Regulation (EU) (EU) 2024/2809 of 23 October 2024 amending Regulation (EU) 2017/1129, (EU) No 596/2014 and (EU) No 600/2014 with a view to enhancing the attractiveness of public capital markets in the Union for companies and facilitating access to capital for small and medium-sized enterprises.

Entity	Number of shares prior to the disposal of shares	Percentage of shares in the share capital prior to the disposal of shares	Number of votes prior to the disposal of shares	% of votes in the total number of votes prior to the disposal of shares	Number of shares after the disposal	% share of shares in the share capital after the disposal of shares	Number of votes following the disposal of shares	Percentage of votes in the total number of votes after the sale of shares
Jaroslaw Wilk	3,150	0.070%	3,150	0.070%	3,003	0.066%	3,003	0.066%

As at the date of publication of this report

To the best of the Company's Management Board's knowledge, the following changes in the number of shares held by shareholder Mr Jarosław Wilk have occurred prior to the publication of this report.

On 7 March 2025, Mr Jarosław Wilk sold 99 shares in the Company in response to the invitation to sell shares dated 18 February 2025 announced by the Company (as reported by the Company in Current Report No. 4/2025 of 18 February 2025). Mr Jarosław Wilk availed himself of the exemption from the obligation to notify the Company pursuant to Article 19(8) of the MAR, as amended with effect from 14 November 2024 by Regulation (EU) (EU) 2024/2809 of 23 October 2024 amending Regulation (EU) 2017/1129, (EU) No 596/2014 and (EU) No 600/2014 with a view to enhancing the attractiveness of public capital markets in the Union for companies and facilitating access to capital for small and medium-sized enterprises.

Entity	Number of shares prior to the disposal	% share of shares in the share capital prior to the disposal	Number of votes prior to the disposal	% of votes in the total number of votes prior to the disposal	Number of shares after the disposal	Percentage of shares in the share capital following the disposal of shares	Number of votes following the disposal of shares	% of votes in the total number of votes following the disposal of shares
Jarosław Wilk	3,003	0.066%	3,003	0.066%	2,904	0.064%	2,904	0.064%

A shareholder of Comp S.A. is CE Management Group Sp. z o.o., which held – as at 31 December 2024 – 241,931 shares in Comp S.A. As at the date of this report, CE Management Group Sp. Ltd. holds 234,001 shares in Comp S.A.

To the best of the Management Board's knowledge (see also current report 2/2017 dated 10 February 2017), the shareholders of CE Management Group Sp. z o.o. include, amongst others, members of the Management Board of Comp S.A., namely Robert Tomaszewski, Krzysztof Morawski, Jarosław Wilk and Andrzej Wawer.

Shareholdings and voting rights held by the above-mentioned persons in CE Management Group Sp. z o.o.				
First name and surname	Shareholding as at 31 December 2024		Shareholding as at the date of publication of this report	
	Number of shares	Proportion of votes	Number of shares	Proportion of votes
Robert Tomaszewski	169,725	58.48%	171,725	59.17%
Krzysztof Morawski	22,227	7.66%	22,227	7.66%
Andrzej Wawer	23,153	7.98%	23,153	7.98%
Jarosław Wilk	8,883	3.06%	8,883	3.06%

30. Information on contracts known to the issuer (including those entered into after the balance sheet date) which may result in future changes to the proportions of shares held by existing shareholders and bondholders.

Subject to the acquisition after the balance sheet date of 120,000 own shares described in Note 59 to the Consolidated Financial Statements, which Comp S.A. disclosed in Current Report No. 5/2025 dated 7 March 2025, The Parent Company is not aware of any agreements which could result in future changes to the proportions of shares held by existing shareholders and bondholders.

31. Information on the control system for employee share schemes.

No control system for employee share schemes was in place during the reporting period.

32. Information regarding:

- a) the date on which the issuer entered into an agreement with an entity authorised to audit financial statements to audit or review the financial statements or consolidated financial statements, and the term for which this agreement was concluded,
- b) the remuneration of the entity authorised to audit financial statements, paid or due for the financial year, separately for:
 - the audit of the annual financial statements,
 - other assurance services, including the review of financial statements,
 - tax advisory services,
 - other services,
- c) the information specified in point (b) must also be provided for the previous financial year.

In 2024, the Company's Supervisory Board appointed an entity authorised to review the half-yearly report and audit the separate and consolidated annual financial statements for the years 2024 and 2025, as well as to provide assurance services for the sustainability reporting for 2024. The service agreement was concluded on 29 July 2024 with Misters Audytor Adviser Sp. z o.o.

Comp S.A. used the services of the selected entity authorised to audit financial statements for the years 2018–2023. In selecting the entity to audit the financial statements, the Supervisory Board acted in accordance with applicable laws, internal regulations and professional standards. The service agreement was concluded for a period of 2 years.

The contract for the provision of services to assess the remuneration reports for 2024 and 2025 was signed on 27 March 2025.

Fees (net amounts excluding VAT)	For 2024	For 2023
Audit of the separate and consolidated financial statements	278	249
<i>Comp S.A.</i>	278	249
<i>Elzab S.A. Computer Equipment Works</i>	-	-
Audit of the separate financial statements	96	149
<i>Enigma Information Security Systems Ltd.</i>	70	70
<i>Comp Service Platform Ltd</i>	26	24
<i>Comp Innovation Centre Ltd.</i>	-	55
Review of the annual consolidated financial statements	-	10
<i>Comp Centrum Innowacji Sp. z o.o.</i>	-	10
Review of the half-yearly separate and consolidated financial statements	125	131
<i>Comp S.A.</i>	125	78
<i>Elzab S.A. Computer Equipment Works</i>	-	53
Assessment of the report on the remuneration of the Management Board and the Supervisory Board	11	12
<i>Comp S.A.*</i>	11	12
Sustainability reporting assurance service	63	-
<i>Comp S.A.</i>	63	-
Total	573	551

*Change in comparable data. The agreement for the assessment of the remuneration report was concluded after the publication of the 2023 financial statements.

Sustainability Report.

Sustainability Report

1. General information

[ESRS 2] General disclosures

[ESRS 2 BP-1] General basis for preparing sustainability statements Basis for preparation

This document has been prepared in accordance with the provisions of the Accounting Act of 29 September 1994 (i.e. as of 4 November 2022, Journal of Laws of 2023, item 120, as amended) (**the Accounting Act**) implementing, inter alia, Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of entities, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC (OJ EU L. 2013 No 182, p. 19, as amended) (**Directive 2013/24/EU**) and Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting standards (OJ EU. L. of 2023, item 2772, as amended), under which the latest European Sustainability Reporting Standards (ESRS) were adopted.

Scope of consolidation

In this report (“Report”), the terms “Comp” or “the Company” refer to Comp S.A. with its registered office in Warsaw, whilst the terms “**Capital Group**”, “**GK Comp**” or “**Comp S.A. Capital Group**” shall be understood to mean the parent company Comp S.A. together with its consolidated subsidiaries. Furthermore, unless otherwise stated, the terms “**Management Board**”, “**Supervisory Board**” or “**General Meeting**” used in the Report refer to the Company’s Management Board, the Company’s Supervisory Board or the Company’s General Meeting, respectively.

The scope of consolidation of the sustainability statement is the same as that of the Financial Statements for the financial year ended 31 December 2024.

This Sustainability Report for the year ended 31 December 2024 has been prepared on a consolidated basis in accordance with the provisions of Chapter 6c of the Accounting Act. The Report covers the period from 1 January 2024 to 31 December 2024, unless otherwise stated in the text.

The information, data, indicators and statements contained in this report relate to the Comp S.A. Group, unless otherwise stated.

Information on the value chain

Based on the ESRS and the principle of double materiality, a comprehensive materiality assessment was carried out within the Comp S.A. Group. The Capital Group’s value chain, described in ESRS 2 SBM-1, supported the materiality assessment process, helping to understand the impact of the Capital Group’s activities on value chain participants, including employees and the environment, and to manage it effectively.

The report contains disclosures describing the value chain at the upstream and downstream levels in the case of the Comp S.A. Capital Group’s value chain, as well as greenhouse gas emissions within Scope 3.

The Comp S.A. Group strives to regularly update internal policies that affect relations with entities in the value chain. The most important internal procedures and policies regarding due diligence, transparency, integrity, ethics and corporate governance within the organisation are set out in section G1.

In the Report, the Group does not provide information regarding intellectual property, know-how or the results of innovation.

The Comp S.A. Group did not make use of the exemptions under Article 19a(3) and Article 29a(3) of Directive 2013/34/EU.

[ESRS 2 BP-2]

Disclosure of information regarding specific circumstances Time horizons

For the purposes of the risk analysis presented in the Report, the time horizons specified in ESRS 1 (short-, medium- and long-term) have been adhered to. Consequently, the time horizons for the risk analysis remain as set out below:

- Short-term horizon – up to 1 year,
- Medium-term horizon – from 1 year to 5 years,
- Long-term horizon – over 5 years.

Estimation of the value chain, sources of estimates and uncertainty of results

Information regarding value chain estimates and the sources of uncertainty in estimates and results is disclosed in ESRS 2 SBM-1. The Comp S.A. Group considers all forward-looking information contained in this report to be uncertain.

Changes in the preparation or presentation of information and reporting errors

This report is the Capital Group's first report prepared in accordance with ESRS standards. Consequently, no changes to the method of preparing or presenting the sustainability statement, nor any errors relating to previous periods, are reported. Until 2023, the Comp S.A. Group prepared sustainability reports based on GRI (Global Reporting Initiative) standards.

Information disclosed on the basis of other regulations or generally accepted interpretations and standards relating to sustainability reporting

The Group does not disclose information in the Report based on other regulations or generally accepted interpretations and standards regarding sustainability reporting.

Specific disclosures

Specific information in the sustainability report for the Comp S.A. Group is disclosed at the end of the Report. Specific disclosures are not defined in the AR.16 ESRS list.

Incorporation by reference

Information on the requirements for incorporating information by reference is disclosed alongside the individual thematic areas of the ESRS.

Use of provisions implemented gradually under Appendix C to ESRS 1

In its 2024 sustainability report, the Comp S.A. Group does not disclose financial estimates regarding key risks and opportunities, including the projected financial impacts arising from physical and transition risks and the resilience of its strategy to climate risks. Due to the complexity of the issues discussed and the need for their long-term verification, the Comp S.A. Group has not yet presented a detailed plan for achieving climate neutrality in terms of Scope 1, 2 and 3 greenhouse gas emissions. The Management Board of Comp S.A. is considering work on a sustainability strategy.

[ESRS 2 GOV-1]

Role of administrative, management and supervisory bodies

Governance structure

The Capital Group’s governance structure is based on the ownership and supervisory control exercised by Comp S.A. and on dialogue between the companies comprising the Capital Group.

The diagram below shows the structure of the Group as at 31 December 2024:

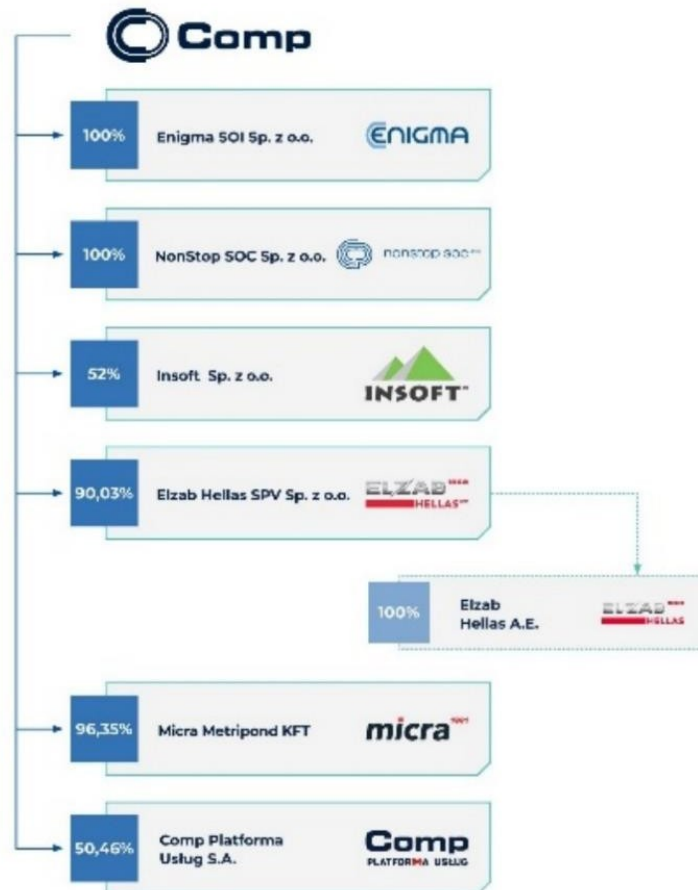


Figure 1. Structure of the Comp S.A. Capital Group

Comp S.A., as the parent company of the Comp Capital Group, exercises ownership supervision over the other companies belonging to the Group and has established a framework for dialogue between them, in accordance with applicable legal regulations.

In accordance with the Articles of Association of the parent company Comp S.A., the governing bodies of the Company are the General Meeting, the Supervisory Board and the Management Board.

General Meeting

The General Meeting is the highest governing body of the Company (decision-making body). Its powers include, amongst other things, adopting resolutions on the distribution of profits or coverage of losses, increasing or reducing the share capital, amending the Articles of Association, and merging or dividing the company.

The table below shows the Company’s shareholding structure as at 31 December 2024, based on notifications submitted in accordance with the law by significant shareholders (holding more than 5% of the voting rights at the Company’s general meeting).

Table 1. Shareholding structure.

Shareholder	Number of shares	Share of total shares and votes at the AGM
Generali OFE managed by Generali PTE S.A.	805,641	17.83%
Investment funds represented by AgioFunds TFI S.A.	701,663	15.53%
Nationale-Nederlanden OFE managed by Nationale-Nederlanden PTE S.A.	481,280	10.65%
Perea Capital Partners, LP	302,480	6.69%
PKO Bankowy OFE and PKO DFE, managed by PKO BP Bankowy PTE S.A.	275,874	6.11%
Robert Tomaszewski*	243,938	5.40%
Comp S.A.	297,245	6.58%
Other shareholders	1,410,198	31.21%
Total	4,518,319	100%

*Robert Tomaszewski holds: – directly, 2,007 ordinary bearer shares, representing 0.0444% of the share capital and corresponding to 2,007 votes, representing 0.0444% of the total number of votes at the general meeting of Comp S.A.;
– indirectly, through CE Management Group sp. z o.o., 241,931 ordinary bearer shares, representing 5.3544% of the share capital and corresponding to 241,931 votes, representing 5.3544% of the total number of votes at the general meeting of Comp S.A.

Supervisory Board

The Supervisory Board exercises ongoing supervision over the parent company's operations and appoints and dismisses members of its Management Board. It is also responsible, amongst other things, for reviewing the financial statements and the Management Board's report on the operations of the parent company and the Capital Group, as well as for selecting the entity authorised to audit the financial statements. The Supervisory Board has appointed three standing committees: the Audit Committee, the Nomination and Remuneration Committee and the Strategy Committee, which are responsible, respectively, for overseeing financial policy, controlling and internal audit; for overseeing human resources policy and the remuneration of members of the Company's Management Board (including their remuneration relative to that within the Company); and for overseeing the adoption and implementation of the Company's strategy.

As at 31 December 2024, the Supervisory Board consisted of six members, namely:

- Grzegorz Należyty – Chairman of the Company's Supervisory Board,
- Ryszard Trepczyński – Vice-Chairman of the Company's Supervisory Board,
- Krystian Brymora,
- Julian Kutrzeba,
- Piotr Kwaśniewski,
- Szczepan Strublewski.

The biographies of the members of the Supervisory Board are included in the Consolidated Financial Statements prepared in accordance with International Financial Reporting Standards for the period 1 January 2024 – 31 December 2024.

It should be emphasised that the individual members of the Supervisory Board possess experience and expertise in the field of the Company's and the Comp Group's operations. In particular, Mr Grzegorz Należyty has experience not only at a strategic level, but also in the new technologies sector, which corresponds to the IT sector's activities at Comp S.A., including through his professional activities and through his work on the supervisory boards of entities within the Comp Group, namely ZUK Elzab S.A. (from 2013 until its merger with Comp S.A.) and PayTel S.A. (between 2013 and 2018). Mr Julian Kutrzeba has experience in the IT/TMT sector (the Company's IT segment). Mr Szczepan Strublewski, Mr Ryszard Trepczyński and Mr Piotr Kwaśniewski have experience not only in management and the IT sector, but also in finance and analytics. Mr Krystian Brymora has experience in finance, analytics and the IT sector. The members of the Supervisory Board have experience in serving on Supervisory Boards.

The Supervisory Board consists entirely of men. All members (100%) meet the independence criteria and possess knowledge and experience of the European market. There are no representatives of the Company's employees or workers on the Supervisory Board.

In 2024, there was one change in the composition of the Company's Supervisory Board. Following the resignation of Mr Piotr Nowjalis, which was received by the Company on 31 October 2024, with effect from the date of the next Extraordinary General Meeting of Comp S.A., but no later than 6 December 2024, at the Extraordinary General Meeting on 6 December 2024, Mr Piotr Włodzimierz Kwaśniewski was appointed to the Company's Supervisory Board to complete the current two-year joint term of office, and was entrusted with the role of member of the Company's Supervisory Board.

At the Company's Annual General Meeting in 2025 (approving the Company's financial statements for 2024), the members of the Supervisory Board for the next term of office will be appointed.

As indicated above, standing committees operate within the Supervisory Board to perform specific supervisory functions. As at 31 December 2024, the composition of the committees is as follows:

Audit Committee of the Supervisory Board of Comp S.A.:

- Mr Ryszard Trepczyński, Chairman of the Audit Committee of the Company's Supervisory Board;
- Mr Grzegorz Należyty;
- Mr Szczepan Strublewski.

Nomination and Remuneration Committee of the Supervisory Board of Comp S.A.:

- Mr Grzegorz Należyty, Chairman of the Nomination and Remuneration Committee of the Company's Supervisory Board;
- Mr Krystian Brymora;
- Mr Ryszard Trepczyński.

Strategy Committee of the Supervisory Board of Comp S.A.:

- Mr Grzegorz Należyty, Chairman of the Strategy Committee of the Company's Supervisory Board;
- Mr Julian Kutrzeba;
- Mr Szczepan Strublewski.

Detailed information on the work of the committees is contained in the report on the activities of the Company's Supervisory Board, which is published annually by the Company and is available on its website.

Members of the Supervisory Board's Audit Committee meet the independence criteria and the requirements regarding knowledge and skills in the industry in which the Company operates, as well as in the field of accounting or the auditing of financial statements. Independence is demonstrated primarily by the absence of direct or indirect links with the Company, members of its Management Board or other members of the Supervisory Board, as well as significant shareholders and entities associated with them. Furthermore, Mr Grzegorz Należyty, who is associated with the energy sector, including renewable energy sources, possesses knowledge and skills in the field of sustainable development with regard to environmental issues. Mr Ryszard Trepczyński possesses knowledge and skills in the field of corporate social responsibility, whilst Mr Szczepan Strublewski possesses knowledge and skills in the field of corporate governance.

The Supervisory Board may adopt a resolution to have a specific matter concerning the Company's operations or assets examined at the Company's expense by a selected adviser ("Supervisory Board Adviser"). A Supervisory Board Adviser may also be appointed to prepare specific analyses and opinions. During the reporting period, the Company's Supervisory Board did not use the services of a Supervisory Board Adviser.

Management Board

The Management Board manages the parent company and represents it externally, including at meetings of subsidiaries. As at 31 December 2024, the Management Board consisted of 4 members. During the reporting period, there were no changes to the composition of the Company's Management Board.

The Management Board of Comp S.A. consists entirely of men, and there are no representatives of the Company's employees or workers on the Management Board. The Company has no authorised signatories, and the Management Board is authorised to appoint them if necessary.

The professional CVs of the members of the Management Board are included in the Consolidated Financial Statements prepared in accordance with International Financial Reporting Standards for the period 1 January 2024 to 31 December 2024.

It should be emphasised that the individual members of the Management Board possess experience and expertise in the field of the Company's and the Comp Group's operations. Mr Robert Tomaszewski is associated with the capital market and also has experience in the incubation of new business concepts. From 2021 to 2024, he served as Chairman of the Management Board of Comp Centrum Innowacji sp. z o.o., and since 2018 he has served as Chairman of the Supervisory Board of Comp Platforma Usług S.A.

Mr Krzysztof Morawski has been working in the IT sector since 1991, including in the civil service. He has worked continuously at Comp S.A. since 1996. He has been Vice-President of the Management Board since 2008. A year earlier, he took up the position of Vice-Chairman of the Supervisory Board of Enigma SOI Sp. z o.o., a role he continues to hold today. Furthermore, Mr Krzysztof Morawski has served as Chairman of the Supervisory Board of Insoft sp. z o.o. since 2019, and as a member of the Supervisory Board of Comp Platforma Usług S.A. since 2018.

Mr Jarosław Wilk has been involved in the retail sector and the fiscal market in Poland since 1996. In 2005, he joined the Comp S.A. Group (NOVITUS S.A.), where he served as a Member of the Management Board and Director of Sales and Marketing. Since June 2017, Mr Jarosław Wilk has also been a member of the supervisory board at Micra-Metripod Kft, and since January 2014 he has been a member of the supervisory board at INSOFIT sp. z o.o., where he previously held the same position between 2007 and 2012. Since July 2019, he has been a member of the supervisory board of Comp Platforma Usług S.A.

Mr Andrzej Wawer has experience in the capital and financial markets, having held management positions in the finance department at numerous companies across various sectors. Since 2005, he has been associated with the Comp S.A. Group (NOVITUS S.A.), where he served as a Member of the Management Board and Chief Financial Officer. In 2009, he took up the position of Member of the Management Board and Chief Financial Officer at Comp S.A., and since July 2018 he has served as Vice-President of the Management Board and Chief Financial Officer. He is responsible for matters relating to financial management. Since 2017, he has been a member of the Supervisory Board of Enigma SOI sp. z o.o. Between 2018 and 2019, Mr Andrzej Wawer was a member of the Supervisory Board of Comp Platforma Usług S.A., and between 2012 and 2018, a member of the Supervisory Board of PayTel S.A.

The Supervisory Board appoints the Management Board, specifying the number of Management Board members for each term of office and the role that the person appointed to the Management Board is to perform. A change in the role performed on the Management Board is not permitted without first removing the person in question from the Management Board. The Supervisory Board may dismiss a member of the Management Board or the entire Management Board of the Company before the end of the term of office. The term of office of the Management Board is joint and lasts four years, calculated in full financial years. The Management Board of the current term was appointed in 2022 (therefore, the term ends at the end of 2026, whilst the mandate of the members of the Management Board of the current term lasts until the General Meeting approving the Company's financial statements for 2026).

In its activities, the Management Board draws on the expertise of advisers who possess knowledge and experience in the field of ESG. The Company's Management Board performs two key functions: (i) it represents the Company in external relations and (ii) manages the Company's affairs.

The term 'representation of the Company' shall be understood to mean 'the performance of legal acts, and in particular the conclusion of contracts, the making and acceptance of declarations of intent, and the appearance before courts, government bodies or local government bodies'. The President of the Management Board is authorised to make declarations of intent and sign on behalf of the Company either alone or jointly with two Vice-Presidents of the Management Board, or jointly with a member of the Management Board.

As regards the Management Board's right to manage the company's affairs, this is regulated by Article 368(1) and Article 371 of the Commercial Companies Code and entails making business and personnel decisions, as well as carrying out a range of practical activities. The aforementioned provisions also contain a presumption of competence on the part of the management body, i.e. the Management Board is competent to deal with all matters which have not been assigned to other company bodies (the General Meeting and the Supervisory Board) under the provisions of the Articles of Association and the law, and which fall within the scope of the Company's affairs.

The Management Board is responsible for implementing and supervising all internal processes within the Company, including the analysis, monitoring and management of risks and opportunities.

It is worth noting that resolutions of the Management Board are adopted by an absolute majority of votes.

Other

The Management Board plays a key role in sustainability reporting within the Group.

To ensure the effective management and monitoring of progress towards achieving the climate-related aspects of the Company's sustainable development goals, a Climate Policy Committee has been established, comprising:

- Andrzej Wawer, Deputy Chairman of the Management Board,
- Jarosław Chyła, Head of Marketing and ESG,
- Zdzisław Mioduszewski, Compliance Officer,
- Zbigniew Kornaś, Management Board Representative for the Quality Management System,
- Elżbieta Marchwińska, Marketing and ESG Manager,
- Michał Płaska, representative of the Retail Innovation Centre,
- Jolanta Ciborowska, representative of Enigma SOI sp. z o.o.,
- Jacek Dutka, Managing Director of Insoft sp. z o.o.

The Climate Policy Committee periodically reports the results of its work to the Management Board.

The Management Board has adopted the Climate Policy, which is available on the website: <https://www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/>

In the social sphere, the Management Board is responsible for defining objectives, organising training, setting the values and strategy of the Capital Group, and monitoring progress in their implementation, particularly with regard to significant impacts, risks and opportunities. At the same time, the Capital Group plans to comply with regulations and best practices relating to organisational development within the framework of sustainable development principles in the coming years.

The Management Board also oversees corporate governance processes, the conduct of audits and the implementation of procedures within Comp S.A. The application of these principles to the monitoring of impacts, risks and opportunities, as decided by the Management Board, is overseen by the Compliance Officer, who reports to the Management Board on impacts, risks and opportunities, and cooperates with the Capital Group's internal auditor on risk monitoring and management. In 2024, Ms Małgorzata Sokółowska served as Compliance Officer until July 2024, whilst Mr Zdzisław Mioduszewski held the post in the second half of the year.

No specific controls or procedures are applied in the management of impacts, risks and opportunities; however, the policies and procedures set out in section G1-1 of the Report, as well as the activities of the Company's internal auditor ("**Internal Auditor**"), apply to these matters. The Internal Auditor works closely with the President of the Company's Management Board and reports functionally to the Supervisory Board of Comp S.A., and in particular to the Audit Committee of the Company's Supervisory Board. In 2024, the Internal Auditor was Ms Maria Papaj-Pienkowska.

Corporate governance processes in other entities of the Capital Group are supervised by the decision-making or supervisory bodies of the respective entities.

The companies belonging to the Capital Group have their own governing bodies as required by the provisions of the Act of 15 September 2000 – Commercial Companies Code (Journal of Laws of 2024, item 18) or other applicable law, and in their operations they are guided primarily by the generally applicable legal provisions in this regard.

Internal control within the Comp S.A. Capital Group operates in the area of the preparation and fair presentation of financial statements, which is noted in the opinion of the statutory auditor reviewing the annual financial statements and in the report on the review of the half-yearly financial statements.

[ESRS 2 GOV-2]

Information provided to the entity's administrative, management and supervisory bodies and matters relating to sustainable development addressed by them

Members of the Management Board act in the interests of the Company and are responsible for the achievement of its objectives, including the implementation of ESG matters. The person coordinating work in this area on behalf of the Management Board is Mr Andrzej Wawer, Deputy Chairman of the Management Board.

On 16 April 2024, the Management Board adopted the Comp S.A. Group Climate Policy, which has been published on the website <https://www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/> ("**Climate Policy**"). Furthermore, the Management Board regularly reviews and updates matters relating to the Company's

by updating the work regulations, policies and internal procedures relating to the ESG area. The most recent such update took place on 23 December 2024.

A Marketing and ESG Department has been established within the Company's management structure, whose director is responsible for providing the Management Board with information on activities carried out in the field of sustainable development.

Management Board meetings take place once a week. ESG-related matters are discussed at every Management Board meeting where decisions are made regarding environmental protection, social issues or corporate governance.

The Company's Supervisory Board is responsible, in particular, for reviewing the strategies of the Company and the Capital Group and for assessing the Management Board's performance in achieving the set objectives.

Notwithstanding the above, the Company's Internal Auditor periodically presents information relating to ESG matters to the Supervisory Board's Audit Committee. The Supervisory Board, and in particular its Audit Committee, was included for the first time in the sustainability reporting process for 2024.

In 2024, in addition to adopting the Climate Policy and establishing the Climate Policy Committee, work began on setting the objectives of the sustainable development strategy, and internal policies and procedures were updated with the aim of eventually extending them to all entities within the Group. The current policies are described under ESRS criterion G1-1, and their description details how sustainability criteria are taken into account in the conduct of business.

The Capital Group plans to commence work on an ESG strategy following the adoption of a new business strategy for the Comp Capital Group for the next period (i.e. for the years 2026–2028). Furthermore, to the extent required by applicable legal regulations, the Management Board will strive to develop a coherent system for reporting on ESG issues within the Comp S.A. Capital Group.

Currently, responsibility for ESG objectives has been organised as follows:

1. a dedicated internal unit has been established within Comp S.A. in the form of the Marketing and ESG Department;
2. a Compliance Officer and an Internal Auditor have been appointed, to whom roles related to ESG have been assigned;
3. a member of the Management Board has been assigned responsibility for ESG matters and recommendations have been issued to other entities within the Capital Group, including model procedures and codes;
4. Reporting on ESG matters has been introduced to the Supervisory Board's Audit Committee.

Every employee is responsible for acting with due diligence in accordance with the business and compliance standards adopted by the Group. Should it be necessary to discuss these matters at a higher level, they are analysed by the Company's Management Board.

Reporting of ESG-related risks to the Management Board takes place on an ongoing basis, with the Head of the Marketing and ESG Department playing a key role in this process. From 2025 onwards, it is planned that the Internal Auditor will prepare a periodic risk review report, including ESG-related risks, which will be submitted to the Management Board for approval and subsequently discussed at a meeting of the Supervisory Board's Audit Committee.

[ESRS 2 GOV-3]

Incorporating sustainability performance into incentive schemes

The remuneration of members of the Company's governing bodies is determined in accordance with the "Remuneration Policy for Members of the Management Board and Supervisory Board of Comp S.A." adopted on 31 August 2020 and most recently amended on 30 June 2022, the current version of which is available on the Company's website: <https://www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/>.

In accordance with the remuneration policy, members of the Company's governing bodies are not offered incentive schemes linked to sustainable development. The Management Board will consider introducing elements into incentive and bonus schemes in future years that are based on the assessment of the achievement of sustainable development objectives or actions.

[ESRS 2 GOV-4]

Statement on due diligence

The individual elements are included in the sections of this report indicated below:

- a) Integration of due diligence into governance, strategy and business model GOV-1, GOV-2, GOV-3, SBM-1, S1-1,
- b) Engagement with stakeholders over whom the entity has influence at all key stages of the due diligence process SBM-2, S1-2,
- c) Identification and assessment of adverse impacts IRO-1, SBM-3;
- d) Taking action to mitigate identified adverse impacts G1-2, S1-3, GOV-5
- e) Monitoring the effectiveness of these efforts and reporting on them.

[ESRS 2 GOV-5]**Risk management and internal controls over sustainability reporting**

The Group does not have separate regulations concerning sustainability risk management; however, depending on developments in legal regulations and best practices related to ESG, the Management Board will consider preparing such regulations in subsequent reporting periods. It should be noted that since 2024, the Comp S.A. Group has had a Climate Policy Committee, which has begun work on defining objectives and monitoring risks and opportunities in the environmental sphere.

The various internal policies and procedures applied across the Capital Group's entities support activities related to the identification and mitigation of risks associated with the Group's operations. The Capital Group does not have a separate, comprehensive set of regulations covering all aspects of risk management.

To ensure effective risk management, including in the area of sustainable development, the Company's Internal Auditor incorporates these considerations into the audit plan and may also conduct *ad hoc* audits relating, for example, to recruitment and the validity of expenditure associated with environmental impact.

Other management issues, including quality, are described in more detail in the chapter on corporate governance.

[ESRS 2 SBM-1]**Strategy, business model and value chain The business****model of the Comp S.A. Capital Group**

The Comp S.A. Capital Group is guided by the values of sustainable development and responsible corporate governance. A key aspect is conducting business in a responsible, transparent and trustworthy manner. The Group's mission is to provide innovative IT solutions and services that meet the needs of its customers, whilst contributing to the well-being of society and the environment.

The Comp S.A. Capital Group operates in the field of IT security on the Polish market and is one of the largest providers of maintenance services, infrastructure support and IT training. It also provides technological solutions supporting trade, services and logistics, including fiscal solutions offered under the NOVITUS and ELZAB brands.

In the field of IT solutions, the Group is engaged in the development of IT solutions by combining its own products with those offered by other hardware and software manufacturers.

The Comp Group comprises technology companies specialising in solutions for network security, cybersecurity and cryptography, as well as IT integration and security, and solutions for retail and services. The Enigma SOI sp. z o.o. production facility in Warsaw houses a production line that is key to the assembly of encryption devices and devices for the electronic monitoring system for convicted persons ("SDE").

In terms of market activities relating to retail products, the Group relies predominantly on the sale of devices and the further development of value-added services under the Software as a Service (SaaS) model. GK Comp collaborates with strategic partners who are leaders in their respective market segments, possessing their own distribution centres and well-developed retail networks. Devices in this segment are mostly

designed and manufactured at “Comp S.A. Sales Technology Centre Branch”, based in Nowy Sącz.

The Comp S.A. Group has been operating on the Polish market since 1990, which has also enabled it to establish itself as a leading manufacturer of fiscal devices in Poland.

IT Segment

The largest market in which the Comp S.A. Capital Group operates is the public sector, which includes central government offices, uniformed services, local government bodies and public entities, including hospitals and universities. A wide range of products and services is offered to this market, including:

1. so-called ‘special security’ – including cryptographic products,
2. networks and cybersecurity,
3. IT integration, infrastructure and services,
4. specialised systems, including SDE.

The second core market for the Comp S.A. Capital Group’s IT operations is the enterprise market. The Comp Capital Group focuses on the largest companies, which also manage the country’s critical infrastructure. Notable clients include: fuel and energy companies, telecommunications operators and banks. Enterprises remain the main customers for network solutions, carrier-grade cybersecurity, monitoring systems, and IT infrastructure and services. Third-party products from key manufacturers in specific product categories account for a significant share of sales.

The Capital Group aims to achieve a high proportion of its own value-added services, which, amongst other things, helps maintain profitability and contributes to building customer relationships, particularly at technical levels.

Retail segment

The retail segment within the Comp S.A. Group comprises solutions designed to support the retail, services, logistics and industrial sectors. The retail segment is responsible for the manufacture or distribution of cash registers and fiscal printers, as well as a wide range of equipment including POS computers, barcode scanners and printers, data collectors and terminals, scales and other weighing equipment.

In addition to hardware solutions, the retail segment also includes fully virtual fiscal solutions for passenger transport and hybrid solutions, including for the self-service car wash industry, both sold on a subscription basis. Sales software for the retail and HoReCa sectors is also a significant part of the retail segment’s offering.

Furthermore, the retail segment operates an IT service centre offering services including:

1. warranty and post-warranty servicing of IT equipment,
2. logistics services for computer parts,
3. outsourcing of local IT resources within the customer’s environment,
4. IMACD+ services (installation and configuration of equipment in the customer’s environment),
5. Extended maintenance services for data centre equipment. The main area of activity is the provision of warranty services on behalf of and at the request of leading IT equipment manufacturers (in particular Dell and HP), post-warranty services (based on numerous service authorisations), and extended maintenance services, designed and delivered in accordance with individual customer requirements.

Export activities of the Comp S.A. Capital Group

In addition to Poland, the Comp S.A. Capital Group exports its products to other countries. These include: the Czech Republic, Slovakia, Hungary, Latvia, Lithuania, North Macedonia, Armenia, Greece, Turkey and the United Kingdom.

The international operations of the parent company Comp S.A. (“Comp S.A. Sales Technology Centre Branch” / NOVITUS brand) involve the export of fiscal devices and their components, primarily to the Greek, Latvian, Macedonian and Hungarian markets.

The foreign operations of the parent company Comp S.A. (Service Centre Branch / CSS brand) are concentrated in the Czech Republic and Slovakia.

The main foreign markets for ELZAB brand fiscal and non-fiscal devices are Hungary, Greece, Turkey and the UK.

The foreign sales operations of Enigma SOI sp. z o.o. are concentrated in the Czech Republic and Armenia. In response to global developments, cooperation with other countries may be subject to restrictions resulting from international sanctions. The Comp S.A. Group limits its cooperation with those countries on which international sanctions (trade embargoes) have been imposed.

Number of employees by geographical area

The number of employees by geographical area is presented in section ESRS S1-6 (Table 23).

Reporting / Segmentation

To accurately reflect the actual operations of the Capital Group, reporting is conducted across two areas: IT and retail (sales technologies). The criterion for distinguishing between the two segments is based on market operations and the nature of customer relationships. The structure of the segments is presented in the table below.

Table 2. Segment structure of the Comp S.A. Capital Group

Segments	Scope of the segment's activities	2024 current period from 01/01/2024 to 31 December 2024		2023 comparative period from 01/01/2023 to 31 December 2023	
		Share in revenue	Share of operating profit	Share of revenue	Share of operating profit m
RETAIL segment	Providing comprehensive solutions for the retail and services sector in the field of fiscal and non-fiscal equipment, and delivering training services to customers and partners. Providing comprehensive outsourcing services for the management of IT infrastructure, maintenance services for computer and office equipment, and the operation of fiscal services.	39%	41%	35%	31%
IT segment	Provision of comprehensive design, implementation, consultancy and training services relating to IT security management. Provision of an optimised and secure network infrastructure ensuring the uninterrupted operation of the company's business processes and data protection and ensuring appropriate environmental conditions (corporate security) Provision of comprehensive IT solutions alongside consultancy services based on mass storage systems, backup and archiving systems, Storage Area Networks and high-availability systems, IT project management, and consultancy on quality management systems	61%	100%	65%	110%
Other		0%	-41%	0%	-41%

The Group manages its capital effectively and achieves operational efficiency. It successfully pursues its strategic objectives, adapting flexibly to the changing market environment. At the same time, it introduces innovations that ensure its competitiveness. A balanced approach to expenditure management enables the Capital Group to maintain financial and operational stability. The Comp Capital Group is systematically building

solid foundations for further development and strengthens its market position, which is also reflected in its financial indicators.

The organisation utilises resources allocated to operational activities, development and investment in a prudent and structured manner. These resources include not only financial resources, but also human, technological, material and time resources, which are carefully managed to support current objectives and the realisation of the long-term development vision. The Comp S.A. Capital Group is committed to the systematic acquisition of data and know-how from a variety of sources, which enables the optimisation of decisions at all levels of the organisation and the maximisation of operational efficiency.

The Comp Capital Group not only acquires resources but also actively develops its resources in key areas of operation. Investments in the development of new technologies, employee skills and infrastructure enable the Capital Group to maintain its leading position in the industry and effectively respond to growing market demands and changing business needs.

The protection of assets is the fundamental purpose of the risk management process. Comp S.A. Group implements effective mechanisms to safeguard its assets against both external and internal threats. In this way, it ensures the stability of its operations and minimises the risk of asset loss or depreciation. Diversifying revenue streams and suppliers is a key strategy for mitigating financial risk. The Comp Capital Group ensures its financial stability and increases its flexibility in the face of emerging market threats. In the context of securing digital assets, the Comp S.A. Capital Group implements and maintains certified management systems designed to ensure the highest quality of services and information security. Acting responsibly, the Capital Group invests in systems that support quality management and data protection in both operational and strategic contexts.

Table 3. Selected financial data from the consolidated financial statements of the Comp S.A. Capital Group

Selected figures from the consolidated financial statements	in PLN thousand		in thousands of EUR	
	Year 2024 current period from 1 January 2024 to 31 December 2024	Year 2023 comparative period from 1 January 2023 to 31 December 2023	Year 2024 current period from 1 January 2024 to 31 December 2024	Year 2023 comparative period from 1 January 2023 to 31 December 2023
I Net sales revenue	903,254	997,503	209,854	220,277
II Profit (loss) from operating activities	71,105	66,058	16,520	14,587
III Gross profit (loss)	55,929	43,535	12,994	9,614
IV Net profit (loss)	38,768	(50,879)	9,007	(11,236)
V Net profit (loss) attributable to the shareholders of the Parent Company	38,091	(44,462)	8,850	(9,818)
VI Total comprehensive income	37,528	(50,220)	8,719	(11,090)
VII Net cash flow from operating activities	204,493	219,532	47,510	48,479
VIII Net cash flows from investing activities	(32,110)	(33,686)	(7,460)	(7,439)
IX Net cash flows from financing activities	(60,882)	(149,722)	(14,145)	(33,063)
X Total net cash flows	111,501	36,124	25,905	7,977
XI Weighted average number of shares	4,376,577	4,611,530	4,376,577	4,611,530
XII Diluted number of shares	4,376,577	4,612,274	4,376,577	4,612,274
XIII Earnings (loss) per ordinary share (in PLN/EUR)	8.70	(9.64)	2.02	(2.13)
XIV Diluted earnings (loss) per ordinary share (in PLN/EUR)	8.70	(9.64)	2.02	(2.13)

Characteristics of the value chain within the Comp S.A. Group

The Comp S.A. Group has an extensive value chain structure, encompassing the activities carried out by its individual entities. It takes into account business links at both higher and lower levels, which consider geographical location and the type of products offered. The results are presented in the ESRS 2 SBM-2 and SBM-3 tables. The organisation's value chain for 2024 is shown in the figure below.

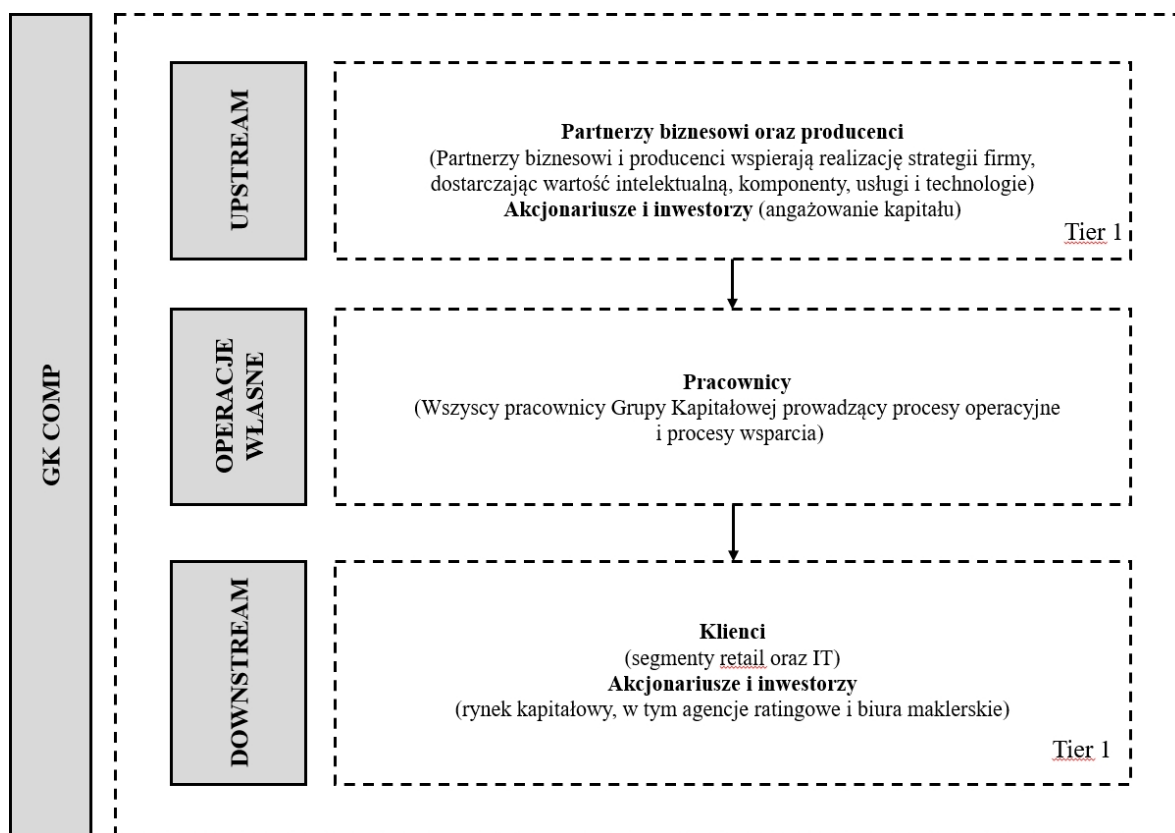


Figure 2. Value chain of the Comp S.A. Capital Group

Characteristics of stakeholders in the value chain

The Comp S.A. Capital Group has identified key stakeholders in the value chain, at both higher and lower levels, taking into account their significant influence on the company's operations, strategy and ability to generate value for entities within the Comp Capital Group. The most important stakeholders include:

1. employees,
2. customers in the retail and IT segments,
3. business partners and manufacturers,
4. shareholders, investors, the capital market, including rating agencies and brokerage firms.

The Comp S.A. Group has also identified stakeholders falling within category b), which includes, amongst others:

1. suppliers of gas, fuel, utilities, and advisory, logistics (courier companies) and office space services,
2. financial institutions, such as banks and insurers,
3. supervisory bodies and regulators,
4. auditors,
5. the wider community.

Due to their relatively lesser significance for the Capital Group's key areas of activity, they have not been classified as stakeholders with priority influence. This choice does not diminish the role of these entities in business processes, but reflects their importance in the context of the strategic objectives being pursued.

Details regarding the interests and opinions of stakeholders are described in ESRS 2 SBM – 2.

Business strategy

The Management Board, in cooperation with the Supervisory Board's Strategy Committee, has developed a strategy for the Group, entitled "COMP 2025 Next Generation" for 2022–2025: <https://www.comp.com.pl/relacje-inwestorskie/strategia/>. The primary objective of the strategy is to ensure the sustained growth of the Comp Group's value, independent of the pace of fiscalisation. The key points of the strategy are:

1. ensuring steady growth in the value of the Group, independent of the pace of fiscalisation from the start of 2023,
2. achieving growth resilient to changing fiscal regulations and increasing financial security whilst maintaining a high level of profit distribution to shareholders,
3. a plan for the final two years of the COMP 2025 Next Generation strategy to deliver systematic EBITDA growth of 20% year-on-year, whilst maintaining optimal debt levels and regular returns to shareholders (dividends, share buybacks),
4. financial plans and targets are conservative, based on existing products and the current offering,
5. additional sources of growth, covered by the strategic analysis but not included in the forecasts presented; for example, we are considering a broader entry into the electromobility market as a manufacturer of car chargers, a market subject to regulatory changes across Europe.

In 2024, the Management Board took up its duties, and on 26 March 2025 the Management Board adopted the new Comp 2028 Security First business strategy for the years 2026–2028 (see current report No. 8/2025 of 26 March 2025), which sets out the key priorities and directions for the Capital Group's development in the coming years. At the same time, following the adoption of the new strategy and depending on the development of legal regulations and best practices related to ESG, there will be scope to develop an ESG strategy and define ESG targets, which will enable a stronger focus on sustainable development, social responsibility and transparent management. When preparing all materials that enable the development of a business model and, with it, a business strategy, the Management Board relies on market data obtained from various sources, including: internal IT systems, market analyses, operational and financial reports, enabling the effective collection, analysis, safeguarding and integration of information from various departments and organisational units.

ESG Strategy

As at 31 December 2024, the Comp S.A. Group did not have a formalised ESG strategy; however, as mentioned earlier, it is considering its implementation. Consequently, preparations have begun for its development, taking into account mechanisms for monitoring key indicators as part of a materiality analysis and an assessment of the resilience of existing policies to challenges related to sustainable development.

The Comp S.A. Group is actively involved in environmental protection efforts, as evidenced by the eco-friendly initiatives it undertakes even before they have been analysed in detail. As a business organisation, it strives to implement all the European Union's climate policy objectives required by law, as set out for 2050. In this context, the Company has adopted a Climate Policy for the Capital Group, which may provide support in developing environmental objectives within the ESG strategy.

The Capital Group will report on the actions taken in subsequent annual sustainability reports. Detailed information on current environmental activities is included in indicator ESRS E1-3 under the Climate Policy.

[ESRS 2 SBM-2]

Stakeholder interests and views

In 2024, the Comp S.A. Group identified stakeholders based on their impact on the company's operations, strategy and ability to create value for the organisation. Furthermore, in the same year, the Comp Group conducted a double materiality assessment in accordance with the requirements of the CSRD and the new reporting standards – the European Sustainability Reporting Standards (ESRS).

In order to maintain the high quality and relevance of the information gathered, surveys were conducted in 2024 amongst 151 internal stakeholders. Surveys of external stakeholders will be carried out in the next reporting year, which will allow for the questions to be refined in detail and tailored

to the specific characteristics of individual groups. This procedure will ensure that the data obtained better reflects the actual areas of activity of the Comp S.A. Capital Group and the specific areas of interest of stakeholders.

Regardless of the survey schedule, the Report sets out the principles of communication and cooperation with all stakeholder groups (both external and internal). It describes the methods and objectives of communication, the means of cooperation, and how the results of cooperation are taken into account.

Table 4. List of stakeholders.

Stakeholder Name	Justification of stakeholder's influence on the Comp Group	Justification of GK Comp's impact on the stakeholder	Method of communication	Purpose of communication	Method of cooperation	Taking account of the results of cooperation
Employees	Employees are a key element in the functioning of the Comp Group. Their commitment, skills and satisfaction have a direct impact on the quality of services and productivity, and consequently, the attractiveness of the Group's offering and its sales figures within the Group. Therefore, ensuring favourable working conditions and opportunities for development is a priority.	GK Comp influences the professional and personal lives of its employees by creating jobs, offering training and career development opportunities. The company can also influence their job satisfaction through its organisational culture, remuneration structure, benefits offered, and by ensuring a work-life balance (a programme promoting a healthy lifestyle, wellbeing training).	Regular internal communication takes various forms, such as the intranet, newsletters, informative emails, posters, team-building events and face-to-face conversations, the company website and . Employee survey.	Maintaining high levels of motivation, a sense of belonging to the organisation, job satisfaction and commitment among employees and developing their skills.	Supporting professional and personal development, ensuring suitable working conditions, internal communication and motivating staff to achieving results.	Analysing the results of employee surveys, reviewing and updating regulations relating to employment law and remuneration. Improving working conditions, streamlining communication, updating the training programme, implementing development programmes. Streamlining the production process.
Customers – retail and IT segments	Customers generate the company's revenue and have a significant impact on its development. Their needs, opinions and loyalty shape the Comp S.A. Capital Group's offering and market strategy. Maintaining high-quality service and innovative solutions is crucial.	GK Comp provides its customers with innovative products and services that support their growth and operational efficiency. The quality and availability of the company's offering contribute to customer satisfaction, as well as their competitiveness in the market and cybersecurity.	Regular contact within the framework of our cooperation is maintained throughout the year via established . This includes face-to-face meetings, workshops, conferences, mailings, participation in trade fairs, and communication via the website and social media.	Meeting customer needs, building loyalty and increasing sales and market share.	Providing services and delivering products in accordance with their specifications and requirements in the areas of technology and retail.	Monitoring customer satisfaction, analysing sales results, and adapting offers and products to market needs.
Business partners/manufacturers	Business partners and manufacturers support the implementation of the company's strategy by providing intellectual property, components, services and technologies. Strong partnerships based on trust and cooperation contribute to the operational efficiency of the Comp S.A. Group.	The Group influences partners and manufacturers through joint projects, order volumes and quality and ethical standards. The Comp Group can support their development through long-term contracts and cooperation based on trust.	Regular contact within the framework of this cooperation is maintained throughout the year via established commercial channels. This includes face-to-face meetings, workshops, conferences, email campaigns, participation in trade fairs, and communication via the website and social media.	Strengthening business relationships. Ensuring the smooth running of cooperation, deliveries and innovative solutions to optimise operations and achieve business objectives.	Collaboration in the provision of intellectual property, components, technologies and services required to deliver the business offering and support operational activities.	Assessment of the quality of cooperation and supplies, cost analysis, cost optimisation, contract renegotiations, and innovation development. Improving cooperation and long-term relationships based on mutual benefits.

<p>Major shareholders and investors – the capital market, including rating agencies and brokerage firms</p>	<p>Shareholders commit their capital in the hope of stable results and long-term growth in the company's value. Their support – financial, supervisory and strategic – plays a key role in achieving business objectives.</p>	<p>Comp Capital Group The company influences its shareholders through its financial results, dividend payments and market value. The company's stability and sustainable development strengthen investor confidence, which directly translates into long-term growth in the value of their shares.</p>	<p>Communication with shareholders takes place through a variety of channels, including face-to-face meetings, results conferences, investor chats, the Annual General Meeting of Shareholders, as well as investor relations materials available on the website and via a dedicated :kontakt.ri@comp.com.pl. Additionally, communication includes the publication of current and periodic reports, as well as non-financial reports</p>	<p>Transparency of operations, maximising value for shareholders and investors, increasing profitability and developing the business in line with investor expectations.</p>	<p>Regular reporting of financial results and strategic consultations regarding the company's development and capital allocation. Providing on actions taken and planned.</p>	<p>Incorporating investor expectations into the long-term strategy, aligning actions with financial results and indicators.</p>
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[ESRS 2 SBM-3]

Significant impacts, risks and opportunities, and their interrelationships with the strategy and business model

Table 5. List of risks and opportunities.

ESRS Issue AR.16	Risk /Opportunity	Materiality assessment	Current and anticipated impacts	Impact on people and the environment	Response and assessment of time horizon	Location of the impact	Current and the expected financial implications
<p>ESRS E1 Climate change. Adaptation to climate change. Use of modern technologies to reduce GHG emissions through fleet modernisation.</p>	Opportunity	<p>Significance of impact: not significant. Financial significance: marginal.</p>	None recorded	CO ₂ emissions and air pollution.	<p>In 2022, the process of monitoring and reporting emissions began, and in accordance with the organisation’s Climate Policy, efforts are being made to reduce GHG emissions by 2050, guided by the GHG Protocol guidelines. The organisation systematically modernises its fleet, adapting it to current environmental and technological standards. We continuously analyse the electric vehicle market in terms of cost-effectiveness and available technologies, particularly taking into account the possibility of funding from EU funds, which could reduce purchase costs.</p>	In-house operations	No significant financial outlay.
<p>ESRS E5 Circular economy. Outputs associated with products and services. Potential inefficiencies in the collection and management of electrical and electronic waste at a lower level.</p>	Risk	<p>Significance of impact: moderately significant. Financial significance: marginal.</p>	None reported	Environmental pollution caused by electrical and electrical equipment.	<p>The organisation cooperates exclusively with authorised waste collection entities, which assume full responsibility for the subsequent management of such waste, including collection, transport, recovery and disposal. In accordance with the Act on waste electrical and Electronic Equipment, devices deemed redundant and unsuitable for further use are treated as waste and handed over exclusively to entities holding the relevant waste management permits and registered in the Database on Products, Packaging and Waste Management (BDO). In addition, Comp S.A. educates its business partners and users on disposal, promoting responsible waste management and minimising our environmental impact.</p>	Downstream	No significant financial outlay.

<p>ESRS S1 Own employees. Equal treatment and equal opportunities for everyone. Training and skills development. Strengthening the organisation's capabilities through team development, retention and recruitment of key management staff and reducing staff turnover.</p>	<p>Opportunity</p>	<p>Significance of impact: significant. Financial significance: none.</p>	<p>Efficiency and competitiveness in the market. Maintaining a high level of innovation and ensuring the highest quality of services provided. Cooperation and collaboration at a high operational and creative level.</p>	<p>Satisfaction and stability in employees' lives. Creativity and the ability to cope more effectively with the surrounding environment. Indirect impact on the environment.</p>	<p>The organisation focuses on attracting talent and effectively managing human resources, offering competitive salaries, regular training and clear career paths, which enables teams to be strengthened quickly. In the long term, investing in the development of employees' skills and the stability of the management team enables the creation of a strong, integrated organisation that responds better to changing market conditions. Furthermore, competitive salaries and investment in staff development and stability help reduce staff turnover, improve team morale and increase engagement, which translates into greater efficiency and better business results.</p>	<p>In-house operations</p>	<p>No additional financial outlay.</p>
<p>ESRS S1 Own staff. Working conditions. Additional benefits that improve work-life balance.</p>	<p>Opportunity</p>	<p>Significance of impact: moderately significant. Financial significance: not applicable</p>	<p>Increased employee satisfaction and fostering their loyalty to the organisation. A good working atmosphere.</p>	<p>A sense of belonging to the organisation and a sense of stability in life. Well-being, physical and mental health. Reduced financial pressure. Indirect impact on the environment through fostering a culture of sustainable development and environmental responsibility.</p>	<p>Recognising the importance of human capital, the Group is constantly developing the benefits it offers, which translates not only into increased employee engagement but also into the stability and the company's competitiveness in the market. Additionally, it runs educational and health-promoting programmes, such as cancer prevention, physical activity and the Comp Team initiative, promoting a healthy lifestyle. Investing in employees remains a key pillar of the organisation's strategy, which will be adapted to dynamic economic and social changes.</p>	<p>Own operations</p>	<p>The Comp S.A. Group incurs small, fixed costs for this purpose.</p>
<p>ESRS S1 Own staff. Equal treatment and equal opportunities for all. Negative assessment of the employer due to human rights violations relating to unequal opportunities, discrimination and bullying.</p>	<p>Risk</p>	<p>Significance of impact: moderately significant. Financial significance: none</p>	<p>A potential decline in the positive working atmosphere could negatively affect cooperation and openness towards others. A decline in the organisation's reputation as a good employer could lead to difficulties in recruiting staff.</p>	<p>Prohibited behaviour, in particular discrimination and bullying. Inequality of opportunity. Unequal access to development and promotion.</p>	<p>The Comp S.A. Capital Group has a Policy on Preventing Prohibited Behaviour, which forms the foundation of an organisational culture based on respect, equality and fairness. Employees are trained on how to recognise and report instances of bullying or discrimination, as well as what steps the organisation takes to protect their rights and ensure a safe workplace. Thanks to these measures, the Comp S.A. Group not only provides comfortable working conditions, but also promotes an atmosphere of mutual respect and cooperation.</p>	<p>Own operations</p>	<p>No significant financial outlay.</p>

<p>ESRS G1 Business conduct. Corporate . Increased employee engagement. Improved employer reputation and brand.</p>	<p>Opportunity</p>	<p>Significance of impact: moderately significant Financial significance: not applicable</p>	<p>Maintaining a high organisational culture, raising employee awareness and preserving the company's strong reputation.</p>	<p>A strong, positive organisational culture. Motivation and retention. Loyalty and identification with the organisation's values. Team engagement and productivity. A responsible approach to people management and building an employer brand. An indirect impact on social and environmental change through shaping organisational culture.</p>	<p>The Comp S.A. Group actively invests in developing a positive organisational culture, strengthening its reputation as an employer of choice. As a result, it successfully attracts and retains the best specialists on the market. As part of its commitment to the highest ethical and operational standards, comprehensive compliance documents have been implemented, which clearly define the organisation's values and standards of conduct for both employees and business partners. As a result, the Group ensures transparency, accountability and compliance with applicable legal regulations, thereby strengthening trust among stakeholders.</p>	<p>Own operations</p>	<p>No significant financial outlay.</p>
<p>ESRS G1 Business conduct. Whistleblower protection. Increasing transparency, promoting ethics and building trust both within the organisation in external relations.</p>	<p>Opportunity</p>	<p>Significance of impact: moderately significant Financial significance: not applicable</p>	<p>Greater transparency and ethical standards within the organisation. Reduced legal and financial risk. Increased trust among employees. Reduction in the number of incidents and abuses. Improved reputation of the organisation.</p>	<p>Transparency, ethics and effective risk management. Detection irregularities. A safe and healthy working environment. Effective compliance mechanisms. Impact on sustainable development, the organisation's reputation and its social responsibility.</p>	<p>The parent company, Comp S.A., has implemented a "Violation Reporting Procedure" in accordance which establishes a mechanism enabling any employee of the Comp S.A. Group to make a report. It ensures compliance with legal provisions, industry regulations and internal ethical standards. A key element of its effectiveness is systematic monitoring, which allows for the ongoing assessment of the procedures' operation, rapid response to reported irregularities and their resolving them.</p>	<p>Own operations</p>	<p>No significant financial outlay.</p>
<p>ESRS G1 Conduct of business. Corruption and bribery. Corruption.</p>	<p>Risk</p>	<p>Significance of the impact: moderately significant Financial significance: not applicable</p>	<p>Cases of corruption could exclude the company from the public market, ruin its reputation and prevent it from securing new contracts. Legal consequences could involve with heavy financial penalties and a loss of trust among business partners and the public.</p>	<p>The organisation's reputation, impact on employees, deterioration of working conditions and job security. The working atmosphere and trust in the organisation. No impact on the environment.</p>	<p>The Comp S.A. Group has not recorded any cases of corruption in recent years. The absence of reported incidents demonstrates to the effectiveness of the mechanisms implemented, including the Anti-Corruption Policy and the Code of Ethics, which set out standards of conduct within the organisation. Given its collaboration with the public sector, particularly in the fields of defence and security, the organisation places particular importance to anti-corruption measures, implementing systematic monitoring and oversight of compliance with ethical principles. At Comp S.A., activities related anti-corruption activities are monitored by the Compliance Officer (see: Anti-Corruption Policy of the Comp S.A. Group and the Procedure for Reporting Breaches at Comp S.A.), who maintains a dialogue with the Management Board and the Company's Internal Auditor</p>	<p>In-house operations</p>	<p>No additional financial outlay.</p>

					and has direct access to the Supervisory Board of the parent company of the Comp S.A. Group	
<p>Other indicators for the Cybersecurity sector. Opportunities for business growth through technological innovation and building the company's image as a technology leader.</p>	Opportunity	<p>Significance of impact: moderately significant. Financial significance: significant.</p>	<p>The growing threat in cyberspace is driving the continuous growth of this market, which is one of the key markets for the Group.</p>	<p>Technological development and innovation. Long-term relationships, attracting talent. Employee and customer education. Professional development. Ensuring security and stability. New technologies contribute to improved energy efficiency.</p>	<p>Cybersecurity is a key area of development for the Group in the coming years. In 2024, the in Poland exceeded PLN 2.5 billion (<i>Source: PMR Report 2024</i>), and its growth is driven by legal regulations (including DORA and the amendment to the Cyber Security Act), government and European funds, and growing awareness of threats. The Group plans to intensify its activities in this area, offering innovative solutions supporting digital security, responding to the need for stability in a digitising world.</p>	<p>Own operations</p> <p>It is possible significant revenue from this in the future.</p>
<p>Other indicators for the Cybersecurity sector. Data breach.</p>	Risk	<p>Significance of impact: moderately significant. Financial significance: none</p>	<p>A data breach would pose a serious threat to a company for which key areas of operation is cybersecurity, undermining its credibility and customer trust.</p>	<p>Customer trust and the company's reputation. A breach of privacy, such as a data leak. A sense of security and stability. Loss of trust in the organisation.</p>	<p>To date, the Comp S.A. Group has not recorded any leaks of its own data or that of its contractors. The companies comprising the Group hold numerous certificates, and Comp S.A. and Enigma SOI sp. z o.o. have implemented a special Information Security System and obtained the relevant security certificates, including ISO 27001. For the organisation, this is a matter of prestige, as the company offers its clients data security solutions.</p>	<p>In-house operations</p> <p>Ongoing expenditure on security updates at the planned level.</p>
<p>Other sector indicators Geopolitical situation. Opportunity to develop products and services due to growing customer demand.</p>	Opportunity	<p>Significance of impact: moderately significant. Financial significance: low.</p>	<p>The geopolitical situation and increasing uncertainty in market behaviour may lead to an increase in demand for security systems.</p>	<p>Cyber threats in a global context. The security of citizens and organisations. Modern data protection solutions, increased digital security. Creating new jobs and improving service quality.</p>	<p>Given the current geopolitical situation, the Comp S.A. Group sees opportunities in the growing demand for modern, secure data management systems and specialist security solutions and data centres. Banks Insurance companies will remain the leading spenders on information security, including access control. In the coming years, spending on these technologies is also expected to double in public institutions and companies managing the country's critical infrastructure, where the organisation serves many key clients. We expect significant market growth over the next five years, although due to its dynamic nature, it is difficult to accurately estimate its scale.</p>	<p>Own operations</p> <p>It is possible significant revenue from this in the future.</p>

<p>Other sector indicators Customer relationship management. Sales growth thanks to an efficient and well-organised distribution network and customer portfolio management.</p>	<p>Opportunity</p>	<p>Significance of impact: moderately significant. Financial significance: none.</p>	<p>Increased availability of products and services. Increased sales.</p>	<p>Sustainable and long-term relationships with customers and distributors. Educational and technical support. Innovative products and services. Improving the operational efficiency of businesses and public organisations. Customer satisfaction, increased market competitiveness and enhanced cybersecurity.</p>	<p>The Comp S.A. Group effectively manages its dealer network, ensuring close cooperation with partners and providing them with the necessary tools and support. It regularly analyses sales results, responding to changing market needs and adapting strategies to customer expectations. The organisation places great emphasis on building lasting relationships, developing the network and introducing innovative solutions that enable it to remain competitive. Long-term customer management also involves safeguarding the brand's image and ensuring consistent communication that meets consumer expectations and market challenges.</p>	<p>Downstream</p>	<p>Maintaining or increasing revenue from a specific business activity.</p>
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[ESRS 2 IRO-1]**Description of the processes used to identify and assess material impacts, risks and opportunities**

The double materiality assessment involves identifying material information regarding impacts, risks and opportunities (IRO) related to sustainability issues. The double materiality analysis process was carried out in the following steps:

Step 1: Understanding the context

At this stage, the Comp S.A. Group reviewed its operations and business relationships, taking into account the context in which these activities take place, and analysed the understanding of key stakeholders on whom it has an impact. This review provides relevant data that is key to identifying material risks and opportunities (MROs) associated with the Comp Group's operations. To fully understand the context, the following were carried out:

1. a review of the business plan, the Comp 2025 'Next Generation' strategy, the 2023 financial statements,
2. a review of the business, its products and services, and geographical reach,
3. mapping of the Comp S.A. Group's business relationships and the value chain at the upper and lower levels (ESRS 2 SBM-1, 2),
4. analysis of published documentation, such as: analysis of other companies, existing sectoral benchmarks regarding general trends in sustainability,
5. analysis of climate scenarios for selected locations of the Capital Group.

Step 2: Identification of current and potential IROs

Identifying actual and potential impacts, risks and opportunities related to sustainability issues throughout the company's value chain, both upstream (suppliers) and downstream (customers). To support this process and ensure completeness, the Comp S.A. Group has used the list of sustainability-related issues in ESRS 1 AR 16.

Step 3: Assessment and identification of material IROs

At this stage, the Comp S.A. Group applied criteria for assessing impact materiality and financial materiality to identify material actual and potential impacts, as well as material risks and opportunities. This forms the basis for determining material information in accordance with the current ESRS requirements for thematic disclosure.

- Materiality of impact: the assessment of the materiality of the severity characteristic (ESRS 1, Appendix A, AR.16) was carried out on the basis of criteria such as: scale (adopted: 1 – low, 2 – medium, 3 – high), scope (adopted: 1 – low, 2 – medium, 3 – high), and irreversibility (adopted: 1 – easy, 2 – medium, 3 – critical).
- Financial materiality: in accordance with ESRS 2, paragraphs 53 and 59, sustainability-related risks and opportunities were assessed on the basis of the likelihood of their occurrence (using the following scale: 1 – unlikely to occur, 2 – unlikely, 3 – moderately likely, 4 – likely, 5 – highly likely) and potential scale (scores: 1 – low, 2 – medium, 3 – high).

The cut-off point for classifying an issue as material was an average score of over 3.0 points, which indicates an issue material to the Comp S.A. Group. Where the Group considered another identified ESG issue to be material but scoring below 3.0 points, this was clearly indicated in the sustainability report.

The Capital Group does not have a separate policy governing the process of identifying, assessing and managing impacts in the area of sustainability; however, the Management Board is considering developing one in future reporting periods.

[ESRS 2 IRO-2]**Disclosure requirements under the ESRS covered by the entity's sustainability statement**

The ESRS disclosure requirements covered by the Comp Group's reporting, together with references to the relevant ESRS titles and page numbers in the report, are presented at the end of the Report.

2. Environmental information

Climate change

[ESRS E1 – 1]

Climate change mitigation transition plan

At the time of writing this Report, a formal transition plan for climate change mitigation had not yet been drawn up. However, in 2024, the first steps were taken to define targets for reducing greenhouse gas emissions, which were reflected in the first version of the Climate Policy. At the same time, the Comp S.A. Group remains ready to respond swiftly to market and regulatory changes.

[ESRS E1 – 2]

Policies relating to climate change mitigation and adaptation

The Comp S.A. Group has drawn up a Climate Policy which sets out its actions in the areas described in ESRS E1-3.

As part of the Climate Policy, the organisation commits to making every effort to achieve results quickly, such as:

1. Reducing emissions through the gradual replacement of the vehicle fleet with eco-friendly vehicles (by 2050 – 100 %, of which at least 50% will be zero-emission vehicles).
2. To maintain the share of renewable energy in total energy consumption at the highest possible level, so that this share exceeds the market average.

In connection with the adopted Climate Policy, a Climate Policy Committee has been established, comprising both employees of the Comp S.A. Capital Group and the Vice-President of the Management Board responsible for ESG matters, Mr Andrzej Wawer, who coordinates the Committee's work.

It should be noted that the Climate Policy will be updated on an ongoing basis in line with the legal framework in force in Poland and the EU. The Comp S.A. Capital Group is also considering the development of a sustainable development strategy, within which climate change-related targets will be defined.

[ESRS E1 – 3]

Actions and resources relating to climate policy

The actions described in the Climate Policy have been defined in accordance with the provisions of the “National Environmental Policy 2030” and the “National Energy and Climate Plan for 2021–2030”. Through these, the Comp S.A. Group actively contributes to climate protection and sustainable development by fulfilling the commitments arising from the Climate Policy. Its implementation will be carried out through:

1. Striving to manufacture products exclusively from certified materials, the recycling and eventual disposal of which have the least possible impact on the natural environment.
2. Introducing IT solutions to replace physical solutions wherever possible. Striving for widespread digitalisation.
3. Minimising transport by using eco-friendly carriers and continuously modernising our own transport fleet to make it more environmentally friendly.
4. Purchasing energy from suppliers guaranteeing a higher proportion of energy from renewable sources.
Furthermore, the Group is considering the possibility of sourcing energy from its own renewable sources in the future, although it does not currently regard this as a priority. As the organisation largely uses rented premises, maintaining a high level of renewable energy sources will involve consultation with the property owners. For its own properties, the organisation plans to conduct a market analysis to implement appropriate solutions.
5. Monitoring the company's environment and utilising all possible applications and processes that will contribute to climate protection in the broadest sense.
6. Awareness-raising and training aimed at promoting environmentally friendly behaviour among Comp Group employees, suppliers and customers.

7. Identifying and minimising the most energy-intensive processes within the Group. Continuous monitoring and analysis of the carbon footprint of operations in accordance with the GHG Protocol standard across all three scopes of emissions.
8. Control over the disposal of all waste generated within the Group from production processes, maintenance services and office work.
9. Thermal modernisation of our own buildings.

None of the measures described above entail significant additional operating or capital costs beyond the budgeted resources already allocated for operations.

[ESRS E1 – 4]

Objectives related to climate change mitigation and adaptation

The Comp S.A. Group is considering the development of a sustainable development strategy that would enable effective monitoring of progress towards selected objectives. The Climate Policy cited in the previous points sets out preliminary assumptions regarding plans to reduce greenhouse gas emissions related to the vehicle fleet and electricity. These include:

1. For the use of the vehicle fleet:
 - a. By 2030 – 50% low- or zero-emission vehicles,
 - b. By 2040 – 75% low- and zero-emission,
 - c. By 2050 – 100%, including at least 50% zero-emission vehicles.
2. For electricity consumption:
 - a. Maintaining the share of renewable energy in total energy consumption at the highest possible level, so that this share is higher than the market average.

It is worth noting that as at 31 December 2024, no specific greenhouse gas emission reduction targets had yet been set for subsequent years, including the base year. The Comp S.A. Group is considering continuing its activities in this area. In 2024, no specific capital expenditure or costs allocated to the achievement of these targets were established either. In subsequent reporting years, it is planned to carry out an analysis that could assist in precisely defining the envisaged sustainable development strategy and the resources necessary for its long-term implementation.

Plans and next steps

The Comp S.A. Group is considering further development in the ESG area. In the near future, it plans to analyse opportunities relating to:

1. Developing a sustainable development strategy.
2. Conducting an in-depth analysis of greenhouse gas emissions reduction, which will enable the setting of targets conducive to achieving net-zero emissions in selected areas.
3. Improving the ESG reporting process.

The Comp S.A. Group's activities in the ESG area will comply with applicable legal regulations and national and EU guidelines. The Group undertakes to align its initiatives with current regulations and best market practices.

[ESRS E1 – 5]

Energy consumption and energy mix

Energy consumption within the Comp S.A. Group stems primarily from the nature of its operations and the infrastructure utilised. Key areas of energy demand include, amongst others:

1. Electronic equipment production lines – energy consumption associated with equipment assembly processes.
2. Office spaces – energy requirements arising from the operation of lighting, office equipment (computers, printers, photocopiers) and heating and cooling systems, which require a constant power supply.
3. ICT equipment and systems – IT infrastructure, telecommunications installations and security systems, which must operate continuously.
4. Transport and logistics – energy consumption by company vehicles.

Table 6. Energy consumption within the Comp S.A. Group

No.	No.	Unit	Year 2024
1.	Consumption of coal and coal products	[MWh]	0
2.	Consumption of petroleum and petroleum products	[MWh]	4,415.81
3.	Natural gas consumption	[MWh]	815.82
4.	Consumption of fuel from other fossil sources	[MWh]	0
5.	Consumption of purchased or procured electricity, heat, steam and cooling from fossil fuel sources	[MWh]	2,533.76
6.	Total energy consumption from fossil fuels (sum of 1–5)	[MWh]	7,765.39
7.	Share of fossil fuels in total energy consumption	[%]	98.18
8.	Fuel consumption from renewable sources, including biomass (also covering industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.)	[MWh]	0
9.	Consumption of purchased or self-generated electricity, heat, steam and cooling from renewable sources	[MWh]	0
10.	Consumption of renewable energy produced in-house without the use of fuel	[MWh]	143.91
11.	Total consumption of renewable and low-carbon energy (sum of 8–10)	[MWh]	143.91
12.	The share of renewable energy sources in total energy consumption	[%]	1.82
13.	Total energy consumption (sum of 6 and 11)	[MWh]	7,909.30

[ESRS E1-6]

Gross greenhouse gas emissions for Scopes 1, 2 and 3, and total greenhouse gas emissions

Table 7. Greenhouse gas emissions for Scopes 1, 2 and 3 calculated in accordance with the GHG Protocol.

	Historical information			Interim targets and target years			
	Base year (2024)	2024	% 2024 / 2023	2025	2030	(2050)	Annual target in % /base year
Scope 1 greenhouse gas emissions							
Scope 1 1 (tonnes of carbon dioxide equivalent)	1,207	1,207	-	-	-	-	-
Percentage of Scope 1 greenhouse gas emissions from regulated emissions trading schemes (%)	0%	0%	-	-	-	-	-
Scope 2 greenhouse gas emissions							
Gross Scope 2 greenhouse gas emissions according to the location-based method (tonnes of carbon dioxide equivalent)	1,175	1,175	-	-	-	-	-
Gross Scope 2 greenhouse gas emissions calculated using a market-based method (tonnes of carbon dioxide equivalent)	1544	1544	-	-	-	-	-

Significant Scope 3 greenhouse gas emissions								
Total gross indirect greenhouse gas emissions (Scope 3) (tonnes of carbon dioxide equivalent)		24,404	24,404	-	-	-	-	-
1	Goods and services purchased	20,750	20,750	-	-	-	-	-
2	Investment assets	1,631	1,631	-	-	-	-	-
3	Fuel and energy activities (not included in scope 1 or 2)	586	586	-	-	-	-	-
4	Transport and distribution at a higher level	175	175	-	-	-	-	-
5	Waste generated during the operation	1	1	-	-	-	-	-
6	Business travel	118	118	-	-	-	-	-
7	Commuting to work	761	761	-	-	-	-	-
8	Higher-level assets subject to lease	88	88	-	-	-	-	-
9	Lower-level transport	289	289	-	-	-	-	-
10	Processing of sold products	-	-	-	-	-	-	-
11	Use of products sold	6	6	-	-	-	-	-
12	Processing of products sold at the end of their shelf life	1	1	-	-	-	-	-
13	Leased lower-tier assets	-	-	-	-	-	-	-
14	Franchises	-	-	-	-	-	-	-
15	Investments	-	-	-	-	-	-	-
Total greenhouse gas emissions								
Total greenhouse gas emissions (location-based method) (tonnes of carbon dioxide equivalent)		26,787	26,787	-	-	-	-	-
Total greenhouse gas emissions (market-based method) (tonnes of carbon dioxide equivalent)		27,155	27,155	-	-	-	-	-

2024 is the first reporting period in which the Comp S.A. Group reports emissions across the entire value chain. Consequently, it is assumed that there have been no changes compared with the previous reporting period.

Organisational boundaries and consolidation of emissions

The Comp S.A. Capital Group includes all consolidated companies in its greenhouse gas emissions reporting. The scope of reporting is consistent with the consolidated financial statements. The method adopted for the consolidation of emissions is based on the criterion of operational control. The inventory consolidates 100% of the emissions of companies over which the Comp S.A. Capital Group exercises operational control.

Due to the nature of the Group's operations, the inventory covers the following greenhouse gases: CO₂, CH₄, N₂O and HFCs.

The Comp S.A. Group operates in numerous locations. A significant proportion of the properties occupied in these locations are leased from external companies. In order to ensure consistent categorisation of emissions arising from the operation of these properties, the Group has adopted a definition of 'operational control'. Operational control at a given location is understood to mean having influence over the choice of

the energy supplier or the ability to directly manage energy consumption at a given location (selection of equipment, influence over operational parameters affecting energy consumption).

Operational boundaries

Based on a review of the list of locations – taking into account the nature and locations of operations, the structure of the Comp S.A. Group, and the fact that this was the first comprehensive emissions inventory – the Comp S.A. Group included the following scopes and categories of emissions in the inventory:

Scope 1:

- Stationary combustion (natural gas and fuel oil).
- Mobile combustion in owned and leased vehicles and machinery (petrol, diesel).
- Fugitive emissions (refrigerant top-ups in air conditioning systems).

Scope 2:

- Consumption of purchased electricity.
- Consumption of purchased heat.

Scope 3:

- Category 1: Purchased goods and services.
- Category 2: Capital goods.
- Category 3: Fuel and energy-related activities (not included in Scope 1 or 2).
- Category 4: Transport and distribution at a higher level.
- Category 5: Waste generated by operations.
- Category 6: Business travel.
- Category 7: Staff commuting.
- Category 8: Higher-level assets subject to leasing.
- Category 9: Lower-level transport.
- Category 11: Use of products sold.
- Category 12: Processing of sold products at the end of their useful life.

The calculation methods for Scope 3 are summarised in Table 11.

The following categories and emission sources have been excluded from the inventory:

Scope 1

- Process emissions – none, given the nature of the business conducted by the Comp S.A.
- Unreported emissions – refrigerant top-ups in the air conditioning systems of company-owned and leased vehicles, due to a lack of data. These emissions are potentially insignificant, but their inclusion is being considered for future years.

Scope 3:

- Category 10: Processing of sold products – The Comp S.A. Group does not manufacture products or semi-finished products for further processing. All of the Group's products are finished goods intended for direct sale to the end customer.
- Category 13: Leased assets – The Group does not rent or lease any assets to third parties.
- Category 14: Franchises – The Group does not engage in franchise activities.
- Category 15: Investments – The Capital Group does not engage in investment activities for its own financial gain. Nor does the Capital Group hold shares in companies whose activities could result in significant emissions.

The reporting boundaries of the Comp S.A. Group in 2024 are summarised in Table 8.

Table 8. Reporting scope of the Comp S.A. Group in 2024.

Company name	Comp S.A. shareholding	Z1	Z2	Z3, category														
				1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Comp S.A.	100%	X	X	X	X	X	X	X	X	X	X	X		X	X			
E nigma SOI Ltd.	100%	X	X	X	X	X	X	X	X	X	X	X		X	X			
Insoft Ltd.	52%	X	X	X	X	X	X		X	X	X							
Micra-Metripod KFT	96.35 %	X	X	X	X	X	X		X		X			X	X			
Elzab Hellas SPV Ltd.	90.03 %	X	X	X	X	X	X		X	X	X							
Elzab Hellas A.E.	90.03 %	X	X	X	X	X	X		X	X	X							
NonStop SOC Ltd.	100%	X	X	X	X	X	X		X	X	X							
Comp Platform Services Ltd	50.46 %	X	X	X	X	X	X		X	X	X							

Calculation methodology

The tables below contain simplified descriptions of the calculation methodologies adopted for each emission category included in the inventory, based on the GHG emissions monitoring methodology implemented within the Group. The sources of the emission factors are explained at the end of the section.

Table 9. Simplified descriptions of methodologies for Scope 1.

Category	Emission source	Type of method	Source of quantitative data	Emission factor source
Stationary combustion	Natural gas and fuel oil	Based on fuel quantities	Own building: invoices from the accounting system. Controlled rented premises: statements and reports provided by the landlord.	DEFRA CF*
Mobile combustion	Petrol and diesel	Based on fuel volume	An extract from the fuel supplier's fleet management system, supplemented with any refuelling outside the network.	DEFRA CF
Fugitive emissions	Air conditioning	Based on the volume of refrigerant refills	Own building: Data obtained from the Equipment Card in CRO (based on entries regarding the quantity of replenished substances). Rented premises: based on data provided by the landlord.	IPCC** AR6

*DEFRA CF – Department for Environment, Food and Rural Affairs in the UK

**IPCC AR 6 – the Sixth Assessment Report on global warming prepared by the Intergovernmental Panel on Climate Change

Table 10. Simplified descriptions of methodologies for Scope 2.

Category	Emission source	Type of method	Source of quantitative data	Emission factor source
Purchased energy consumption	Electricity	Based on the amount of electricity	Own building: invoices from the accounting system. Rented premises: based on statements and reports provided by the landlord.	KOBIZE* LB AIB MB
Consumption of purchased energy	Heat	Based on the amount of heat	Rented premises: based on statements provided by the landlord.	URE**

*KOBIZE – National Centre for Emissions Balancing and Management

**URE – Energy Regulatory Office

Scope 3:

In 2024, the Comp S.A. Group is reporting Scope 3 emissions for the first time. Due to limited resources, the strategy adopted for the first year of reporting was to rely, for certain categories, on the simplified, expenditure-based methods proposed by the GHG Protocol. In some cases, emissions were estimated using the organisation's own assumptions and estimates. In every instance, however, the organisation acted to the best of its knowledge and with the utmost care.

The organisation is aware that relying on expenditure-based methods is not very accurate and may lead to an overestimation of emissions. In subsequent years, it will aim to rely on data from suppliers or obtain more accurate emission factors based on industry averages.

Table 11. Simplified descriptions of methodologies for Scope 3.

Category	Type of method	Source of quantitative data	Source emission factor
Category 1: Purchased goods and services	Expenditure-based	Extract/report from the accounting system (SAP / Symfonia / Enova) – turnover in the relevant accounts relating to the cost of services purchased and expenditure on the purchase of materials, goods and licences.	DEFRA EEIO
Category 2: Capital goods	Expenditure-based	Expenditure reported according to the debit and credit movement tables (data from consolidated debit and credit movement tables – purchase and acceptance under lease).	DEFRA EEIO
Category 3: Other emissions from fuels and energy	Based on fuel and energy quantities	The method is based on the quantitative data used for calculations in Scope 2.	DEFRA CF
Category 4: Upstream transport and distribution	Based on expenditure	Extract/report from the accounting system – turnover in accounts relating to transport. ERP (SAP / Symfonia / Enova).	DEFRA EEIO
Category 5: Waste from operations	Based on the quantity of waste and the method of management	Data from the BDO waste register aggregated for each business location.	DEFRA CF
Category 6: Business travel	Based on expenditure	Extract/report from the accounting system – turnover of accounts relating to business travel. ERP (SAP / Symfonia/Enova).	DEFRA EEIO
Category 7: Commuting	Distance-based	Employee survey, extrapolated to the whole organisation.	DEFRA CF
Category 8: Leasing and upstream rental	Expenditure-based	Extract/report from the accounting system – turnover in accounts relating to transport. ERP (SAP / Symfonia / Enova).	DEFRA EEIO
Category 9: Transport and downstream distribution	Fuel-based	Own assumptions regarding average distance and statistics on modes of transport in Poland.	DEFRA CF
Category 11: Use of products sold	Based on electricity consumption	Design parameters for individual product groups (power + own assumptions regarding daily usage time and product lifespans).	KOBIZE
Category 12: Management of sold products at the end of their life cycle	Based on waste quantities and management methods	Quantitative data adopted on the basis of Category 11. Design parameters for individual product groups (mass) Our own assumptions regarding waste management.	DEFRA CF

The following sources of emission factors were used in the inventory:

- **AIB** – the AIB publication “European Residual Mix” from year N – 1 for the report for year N (from 2023 for the report for 2024) - <https://www.aib-net.org/facts/european-residual-mix>
- **DEFRA CF** – DEFRA publication ‘Conversion Factors (full set for advanced users)’ for the year for which the calculations are being performed – <https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>
- **DEFRA EEIO** – DEFRA publication ‘UK and England’s carbon footprint’ from year N – 3 for the report for year N (from 2021 for the 2024 report) - <https://www.gov.uk/government/statistics/uks-carbon-footprint>
- **IPCC AR6** – GWP values for individual greenhouse gases, IPCC AR6 report: WG1, Chapter 7, Supplementary material, Table 7.SM.7. In practice, the GHG Protocol publication from August 2024 compiling coefficients from individual reports AR - <https://ghgprotocol.org/sites/default/files/2024-08/Global-Warming-Potential-Values%20%28August%202024%29.pdf>
- **KOBIZE** – emission factors for electricity from year N–1 for the report for year N (from 2023 for 2024). To avoid double counting with category 3 of scope 3, the factor

has been adjusted to exclude grid losses –
<https://www.kobize.pl/pl/fileCategory/id/28/wskazniki-emisyjnosci>

- **URE** – URE publication ‘Heat Energy in Figures’ for year N – 1 for the report for year N (from 2023 for the report for 2024) –
<https://www.ure.gov.pl/pl/cieplo/energetyka-cieplna-w-1>

2024 is the first reporting period in which the Comp S.A. Group reports emissions for the full value chain. It is assumed that during the reporting period there were no events or changes that significantly affected greenhouse gas emissions.

To the best of the Comp S.A. Capital Group’s knowledge, the organisation’s activities do not result in significant biogenic greenhouse gas emissions. The Capital Group is aware that such emissions may occur, for example, as a result of the combustion of motor fuels purchased on the market or in connection with the production of energy purchased from the market. An estimate of these emissions will be considered in subsequent reporting periods.

In 2024, the Group entered into contracts for the purchase of electricity; however, it is not possible to unequivocally confirm the carbon footprint of the purchased energy on the basis of these contracts. All purchased energy is treated as the national average energy mix.

In 2024, the Comp S.A. Capital Group attempted to obtain primary data from its partners. Due to the limited impact of these efforts, the Group did not use emission factors from suppliers or other partners when calculating Scope 3 emissions. Consequently, the percentage of emissions calculated using primary data obtained from suppliers or other partners in the value chain is 0%.

Table 12. Greenhouse gas emissions intensity per net revenue.

Greenhouse gas emissions intensity per net revenue	2024	% 2024 / 2023
Total greenhouse gas emissions (using the location-based method) per net revenue (tonnes of CO ₂ equivalent per million PLN)	29.66	-
Total greenhouse gas emissions (using the market-based method) per net revenue (tonnes of CO ₂ equivalent per million PLN)	30.07	-

The net revenue used in the calculations is ‘Net sales revenue’ from the ‘Selected financial data’ table in the financial statements.

[ESRS E1 – 7]

Greenhouse gas removal and emission reduction projects financed through carbon credits

In 2024, the Comp S.A. Group did not undertake any activities related to the indirect reduction of greenhouse gas emissions and did not purchase carbon credits.

[ESRS E1 – 8]

Setting internal carbon prices

The Comp S.A. Group does not use systems for setting internal carbon prices.

[ESRS E1 – 9]

Expected financial impacts arising from significant physical and transition risks and potential climate-related opportunities

Due to the specific nature of the organisation’s operations (IT and retail sectors), the 2024 analysis did not estimate the potential financial impacts associated with significant physical and transition risks.

Resource use and the circular economy

[ESRS E5 – 1]

Policies relating to resource use and the circular economy

As at the date of this Report, the Comp S.A. Group had not implemented formal policies regarding resource management and the circular economy. However, the organisation is aware of the importance of these

addresses these issues and takes steps to optimise the use of components and minimise waste. All processes relating to resource management and waste management are carried out in accordance with applicable legal regulations and the principles of environmental responsibility.

[ESRS E5 – 2]

Activities and resources related to resource utilisation and the circular economy

The Comp S.A. Group attaches great importance to the cooperation of its companies with organisations involved in recovery, which enables the achievement of collection levels for used equipment and packaging in accordance with the requirements of applicable regulations, as well as the timely fulfilment of reporting obligations. In accordance with the regulations, waste management reports are prepared by 15 March each year.

Due to the nature of its business, the Comp S.A. Capital Group introduces electrical and electronic equipment, batteries and packaging to the Polish market, which necessitates compliance with environmental regulations.

In terms of minimising its environmental impact, the Comp S.A. Group undertakes measures aimed at the proper disposal of electronic equipment and other waste. In carrying out these tasks, the Group complies with applicable legislation, enters into appropriate contracts for the collection of waste and sewage, and pays environmental charges.

The activities planned for 2024 include:

1. Conducting selective collection of electronic waste and batteries, and equipping staff facilities with bins to make it easier for employees to sort waste.
2. Collaboration with a specialist electronic equipment recovery organisation to ensure maximum recovery of end-of-life equipment withdrawn from the market, which runs public awareness campaigns on environmental protection.
3. Optimising packaging design to reduce material consumption and waste generation.
4. Reducing waste generation through cooperation with the Packaging Recovery Organisation.
5. Selling the majority of Insoft sp. z o.o.'s software exclusively in electronic form.
6. Participation in a programme for the collection of used printer cartridges, development of waste disposal instructions and procedures, and regular staff training in this area.
7. Reducing plastic consumption by eliminating single-use cutlery, cups and plates, using 'traditional' or biodegradable tableware, and introducing water dispensers.
8. Maintaining the EOD system at Comp S.A., which ensures the electronic circulation of accounting documents integrated with SAP and Symfonia systems, as well as payment processing, a register and archive of contracts, correspondence logs, holiday request processing, and business trip accounting.
9. Providing employees with eco-friendly pens made from recycled paper.

The Comp S.A. Group is taking steps to minimise the potentially inefficient collection of electrical and electronic waste, which may pose a threat to the environment at the end of its life cycle. The parent company, Comp S.A., operates an online system for its business partners, which provides distributors with information on the rules for disposing of equipment. In addition, QR codes with instructions on waste management are placed on product packaging, and user manuals contain detailed information on the proper disposal of a given product.

None of the measures described above require significant additional operating or capital expenditure beyond the budgeted resources already allocated.

[ESRS E5 – 3]

Targets relating to resource use and the circular economy

In 2024, the Comp S.A. Group did not set any targets regarding resource use and the circular economy.

[ESRS E5 – 4]

Inputs

Companies belonging to the Comp S.A. Group order components for the manufacture of their equipment, including electronic sub-assemblies, electronic components, housings, electrical cables, assembly parts and other

materials required for the final assembly of the product. These products are sourced exclusively from suppliers meeting specific quality standards.

Currently, the organisation does not have a defined policy regarding the impact of resources, which is an area requiring further action. The total weight of the devices manufactured from the aforementioned components is 155.8 tonnes¹. Additionally, MICRA produced 10 vehicle scales with a metal-concrete structure, each weighing 11.75 tonnes.

[ESRS E5 – 5]

Resources discharged

Within the Comp S.A. Group, discharged resources comprise:

1. Waste consisting of electrical, electronic and other equipment generated as a result of manufacturing, maintenance and service activities.
2. Products manufactured in the production process and placed on the market, which are subject to disposal at the end of their life cycle.

In 2024, the Comp S.A. Capital Group identified a total weight of 79.71 tonnes of waste generated during the production process and as a result of maintenance activities.

In addition, the Group incorporated a total of 155.8 tonnes of goods into its own manufactured products, and a total of 193.7 tonnes when including products purchased for resale.

In the process of managing the waste generated, the Comp S.A. Group cooperates with a specialist company which ensures disposal processes in accordance with the law in force in Poland. The partner guarantees that the legally required levels of disposal and collection of equipment, packaging, and batteries and accumulators are met, ensuring the safety of their transport, processing and final disposal, whilst minimising the risk of negative environmental impact.

Table 13. Waste generated during production processes, maintenance activities and the provision of services.

BDO waste code	Waste type	Weight [t]
15 01 01	Paper and cardboard packaging	36.92
15 01 02	Plastic packaging	7.20
16 02 13*	Waste equipment containing hazardous components other than those listed in 16 02 09 to 12	6.82
16 02 14	Waste equipment other than those listed in 16 02 09 to 13	32.11
16 02 16	Components removed from waste equipment other than those mentioned in 16 02 15	0.43
16 06 05	Other batteries and accumulators	2.37
17 09 04	Mixed construction and renovation waste	0.50
18 01 03*	Other waste containing viable pathogenic micro-organisms or their toxins, and other forms capable of transmitting genetic material, which are known or for which there are credible grounds to believe that they cause disease in humans or animals, excluding 18 01 80 and 18 01 82	0.15
18 01 04	Waste other than that mentioned in 18 01 03	0.002

* Waste classified as hazardous under the Regulation of the Minister for Climate of 2 January 2020 on the waste catalogue.

Table 14. Weight of equipment and packaging placed on the market within the country in 2024.

Type	Weight [t]
Packages placed on the market*	97.40
Equipment placed on the market**	194.04
Batteries and accumulators***	7.20

* Required recycling/recovery rate – 63%, Regulation of the Minister for Climate and the Environment of 19 December 2021 on annual packaging waste recycling rates for individual years up to 2030: <https://isap.sejm.gov.pl>

** Required collection rate – 65%, Act of 11 September 2015 on waste electrical and electronic equipment (Article 20): <https://isap.sejm.gov.pl>

*** Required collection rate – 45%, Regulation of the Minister for the Environment of 3 December 2009 on annual collection rates for waste portable batteries and waste portable accumulators: <https://isap.sejm.gov.pl>

¹ The figures given are based on the unit mass of the equipment.

[ESRS E5 – 6]**Anticipated financial impacts resulting from significant risks and opportunities related to resource use and the circular economy**

Due to the specific nature of the organisation’s activities (IT and retail sectors), no estimate was made in 2024 of the potential financial impacts arising from significant risks and opportunities related to resource use and the circular economy.

3. Taxonomy

Introduction

The EU Taxonomy was introduced by Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment. The EU Taxonomy is a mechanism that makes it possible to determine whether a given economic activity

ASSESSMENT OF COMPLIANCE WITH REGULATION (EU) 2020/852

In accordance with Article 8(2) of the EU Taxonomy, *‘Non-financial undertakings shall disclose, in particular, the following information:*

- a) the percentage of their turnover derived from products or services related to economic activities that qualify as environmentally sustainable pursuant to Articles 3 and 9; and*
- b) the percentage of their capital expenditure and operating expenditure corresponding to assets or processes related to economic activities that qualify as environmentally sustainable pursuant to Articles 3 and 9.’*

In accordance with the Commission Notice on the interpretation of certain provisions of the delegated act laying down disclosure obligations pursuant to Article 8 of the EU Sustainable Development Taxonomy Regulation concerning the reporting of eligible economic activities and eligible assets (2022/C 385/01), if an undertaking generates turnover or incurs capital expenditure or operating expenditure corresponding to the economic activities described in the delegated acts², it will be considered eligible for disclosure regarding eligibility for the taxonomy. The same Commission notice indicates that the EU Taxonomy and the relevant delegated acts do not distinguish between core and ancillary economic or business activities. An undertaking should therefore report all of its economic activities that fall within the definition of ‘economic activities eligible for the taxonomy’ set out in Article 1(5) of Regulation 2021/2178, which lays down disclosure obligations. Consequently, for the purposes of assessing eligibility, the entire business activities of the Comp S.A. Group were examined, not just its core business, taking into account, amongst other things:

- plans aimed at expanding economic activities in line with the EU Taxonomy or enabling economic activities eligible for the Taxonomy and aligning with the Taxonomy (“capital expenditure plan”),

The delegated acts include: (i) Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council (EU) 2020/852 by establishing technical eligibility criteria to determine the conditions under which an economic activity qualifies as making a significant contribution to climate change mitigation or adaptation, and to determine whether that economic activity does not cause significant harm to any of the other environmental objectives (OJ EU L 442, 2021, p. 1, as amended), (ii) Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards the public disclosure of specific information relating to those economic activities (OJ EU L 188, 2022, p. 1), (iii) Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Regulation (EU) 2021/2139 establishing additional technical eligibility criteria to determine the conditions under which certain economic activities qualify as making a significant contribution to climate change mitigation or adaptation, and determining whether such activities cause no significant harm to any of the other environmental objectives (OJ (EU) L 2485 of 2023), (iv) Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council (EU) 2020/852 by establishing technical eligibility criteria to determine the conditions under which a given economic activity qualifies as making a significant contribution to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to the prevention and control of pollution, or to the protection and restoration of biodiversity and ecosystems, and to determine whether that economic activity causes no significant harm to any of the other environmental objectives, and amending Commission Delegated Regulation (EU) 2021/2178 as regards the public disclosure of specific information relating to those economic activities (OJ EU L 2023, p. 2486).

- the procurement of products from economic activities consistent with the EU Taxonomy and individual measures enabling the target activity to become low-carbon or to reduce its greenhouse gas emissions, in particular the types of activities listed in points 7.3 to 7.6 of Annex I to Regulation 2021/2139, as well as other economic activities listed in the Delegated Acts adopted pursuant to Article 10(3), Article 11(3), Article 12(2), Article 13(2), Article 14(2) or Article 15(2) of the EU Taxonomy, and provided that those measures are implemented and operational within 18 months.

Compliance assessment

In accordance with Article 3 of the EU Taxonomy, an economic activity qualifies as environmentally sustainable if that activity:

- a) makes a significant contribution to the achievement of at least one of the six environmental objectives,
- b) does not cause significant harm to any of the other environmental objectives,
- c) is carried out in accordance with minimum safeguards; and
- d) meets the technical eligibility criteria set out in the Delegated Acts

The assessment of the compliance of activities qualifying under the EU Taxonomy involved an analysis of the technical eligibility criteria relevant to specific types of activities, as set out in the relevant Delegated Regulations, and an analysis of the degree of compliance of the economic activities carried out by the Comp Capital Group with the minimum safeguards.

Accordingly, the following steps were taken to assess the preparation of taxonomy disclosures:

- Stage 1 – assessment of eligibility, i.e. identification of the activities of the Comp S.A. Group that are included in the EU Taxonomy,
- Stage 2 – assessment of compliance with the technical eligibility criteria – in relation to the criteria of significant contribution and the DNSH principle,
- Stage 3 – assessment of minimum guarantees.

Stage 1: Eligibility assessment, i.e. identifying the activities of the Comp Group that are included in the taxonomy.

In the first step, the activities and operations of the Comp S.A. Group were identified that may make a significant contribution to the achievement of environmental objectives. As part of taxonomy disclosures for the reporting period 1 January 2024 – 31 December 2024, companies subject to the reporting obligation should carry out an assessment of eligibility for the EU Taxonomy in relation to all environmental objectives, i.e.:

Objective 1: Climate Change Mitigation

(CCM) Objective 2: Climate change adaptation (CCA)

Objective 3: Sustainable use and protection of water and marine resources (WTR) Objective 4:
Transition to a circular economy (CE)

Objective 5: Pollution prevention and control (PPC)

Goal 6: Conservation and restoration of biodiversity and ecosystems (BIO)

Conservation and restoration of biodiversity and ecosystems (BIO)

The assessment of eligibility was carried out on the basis of the following delegated acts:

- Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021
- Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022
- Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023
- Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023

Following an analysis, the activities of the Comp S.A. Group that qualify for the EU Taxonomy have been identified.

Table 15. Activities of the Comp S.A. Capital Group qualifying for the EU Taxonomy

Activity No.	Type of activity in accordance with the EU Taxonomy
CCM_7.6	Installation, maintenance and repair of renewable energy technology systems
CCM_8.1	Data processing, website hosting and similar activities
CE_1.2	Manufacture of electrical and electronic equipment
CE_5.1	Repair, modernisation and refurbishment of products

Stage 2 – Assessment of compliance with the technical eligibility criteria

For the purposes of verifying compliance with the technical eligibility criteria, relevant information was gathered and assessed to determine whether the economic activity meets the conditions set out in the technical eligibility criteria, i.e. the criteria defined for both the ‘significant contribution’ principle and the DNSH (Do No Significant Harm) principle.

Among the eligible activities making a significant contribution to Objective 1 (CCM) and Objective 4 (CE), the analysis carried out showed that the following activities meet all the required technical eligibility criteria – both for the significant contribution principle and for the ‘do no significant harm’ (DNSH) principle.

Table 16. Types of activities of the Comp S.A. Group in accordance with the EU Taxonomy

Activity No.	Type of activity in accordance with the EU Taxonomy
CCM_7.6	Installation, maintenance and repair of renewable energy technology systems
CE_5.1	Repair, modernisation and refurbishment of products

Stage 3 – Assessment of minimum guarantees

In accordance with Article 18(1) of the EU Taxonomy, *“The minimum safeguards referred to in Article 3(c) are the procedures applied by an undertaking engaged in economic activity to ensure compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions referred to in the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work and the principles and rights set out in the International Bill of Human Rights.”*

Minimum safeguards therefore refer to procedures designed to ensure compliance with:

- the OECD Guidelines for Multinational Enterprises
- the UN Guiding Principles on Business and Human Rights,
- the principles and rights set out in the eight fundamental conventions referred to in the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work, and the principles and rights set out in the International Bill of Human Rights

Given that not all subsidiaries within the Comp S.A. Group have implemented the Compliance Policies, it must be concluded that in 2024 the minimum safeguards were not met at the level of the entire Comp S.A. Group. Consequently, a detailed analysis of compliance with the minimum safeguards has been omitted.

Key performance indicators

Based on the information compiled as part of the analyses described in Stages 1–3, the Comp S.A. Group has calculated key performance indicators relating to the EU Taxonomy in respect of revenue, capital expenditure and operating expenses.

Table 17. Key performance indicators of the Comp S.A. Group

Key performance indicators of the Comp S.A. Group	Turnover	Capital expenditure	Operating expenses
Value in 2024 (PLN thousand)	903,254	41,872	9,263
Environmentally sustainable operations (in accordance with the classification system)	0%	0%	0%
Non-sustainable activities (eligible for the classification system but non-compliant)	32%	14%	22%
Activities not eligible for the scheme	68%	86%	78%

The disclosures regarding key performance indicators have been made on the basis of the following delegated acts:

- Commission Delegated Regulation (EU) 2023/2178 of 6 July 2021
- Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022
- Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023

Accounting principles

In order to calculate the percentage of turnover, capital expenditure and operating expenditure eligible for and in accordance with the scheme, we have applied the following principles:

Turnover

With regard to turnover, the basis was the total consolidated revenue of the Comp Capital Group S.A. in 2024, disclosed in the 2024 Consolidated Financial Statements under the heading 'Consolidated Statement of Comprehensive Income', as described in Note 43. Revenue from activities falling under the following categories has been allocated to the numerator:

- CCM 8.1 – Data processing; website hosting and similar activities
- CE 1.2 - Manufacture of electrical and electronic equipment
- CE 5.1 - Repair, modernisation and refurbishment of products

The Comp S.A. Group generates revenue primarily from the sale of electrical and electronic equipment (including cash registers) and from its servicing activities. In 2024, it also generated revenue from data processing.

The Comp S.A. Group does not use the products it manufactures for its own purposes (internal consumption).

The turnover generated by the Comp S.A. Group in 2024 relates to revenue from contracts with customers. The determination and allocation of turnover from activities falling within the scope of the classification system to the relevant account was carried out through an analysis of summary and analytical accounts.

Table 18. Percentage share of turnover from products or services related to economic activities in accordance with the EU Taxonomy in 2024.

Financial year 2024	2024			Criteria relating to significant contribution						Criteria regarding the DNSH principle (“do no significant harm”)						Minimum safeguards	Participation of activities in line with the framework (A.1.) or eligible for the scheme (A.2.) Turnover in 2023	Category: Support activities	Transitional activities category
	Code or codes	Turnover	Share of turnover, 2024	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity				
A. ACTIVITIES ELIGIBLE FOR THE SCHEME		PLN thousand	%	T; N; N/EL	T; N; N/EL	T; N; N/EL	T; N; N/EL	T; N; N/EL	T; N; N/EL	T/N	T/N	T/N	T/N	T/N	Y/N	Y/N	%	E	T
A.1. Types of environmentally sustainable activities (in accordance with the classification system)																			
Data processing; website (hosting) and similar activities	CCM 8.1	0	0%														1.03%		
Software and IT consultancy and related activities	CCM 8.2	0	0%														26.32%		
Turnover from environmentally sustainable activities (in accordance with the classification) (A.1)		0.00	0%														27.35%		
including support		0.00	0%														0%		
of which for transition		0.00	0%														0%		
A.2. Activities eligible for the scheme but environmentally unsustainable (activities not compliant with the scheme)																			
Manufacture of electrical and electronic equipment	CE 1.2	144,392.37	15.99%	N/A	N/A	N/A	N/A	N	N/EL								0%		
Repair, modernisation and refurbishment of products	CE 5.1	145,355.82	16.09%	N/A	N/A	N/A	N/A	N	N/EL								0%		
Data processing; website (web hosting) and related activities	CCM 8.1	1,035.00	0.11%	N	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Turnover from activities eligible for the scheme but environmentally unsustainable (activities not in line with the classification) (A.2)		290,783.20	32.19%	0.11%	0%	0%	0%	32.08%	0%								0%		
Turnover from activities eligible for the scheme (A.1+A.2)		290,783.20	32.19%	0.11%	0%	0%	0%	32.08%	0%								27.35%		
B. ACTIVITIES NOT COVERED BY THE CLASSIFICATION																			
Turnover from activities not falling within the classification		612,471	67.8%																
TOTAL		903,254	100%																

Capital expenditure

In with regard to capital expenditure the basis was capital expenditure accounted for in individual companies of the Comp S.A. Capital Group. The total amount of capital expenditure is presented in notes 1b and 2b to the Consolidated Financial Statements for 2024. The numerator includes that portion of capital expenditure relating to business activities falling within the classification for the following types of activity:

- CE 1.2 Manufacture of electrical and electronic equipment
- CE 5.1 Repair, modernisation and refurbishment of products
- CCM 7.6 Installation, maintenance and repair of renewable energy systems

The activity “CCM 8.1 – Data processing; website management (hosting) and similar activities”, which qualifies for the classification, was not included in the investment expenditure counter due to the absence of fixed assets used for this taxonomic activity.

The determination and allocation of capital expenditure values to the counter was carried out by the entity through the identification of all increases in the register of tangible fixed assets, including leases (understood as a right of use in accordance with IFRS 16) and intangible assets. The Comp Group does not hold investment property.

In the case of expenditure on research and development, a allocation key was adopted, calculated on the basis of the production of physical and virtual cash registers during the year.

The Comp Group has no investment plans as referred to in Delegated Regulation 2021/2178, point 1.1.2.2.(b). Consequently, it does not disclose information relating to plans concerning capital expenditure.

Table 19. Percentage share of capital expenditure related to business activities in accordance with the EU Taxonomy in 2024.

Financial year 2024	2024			Criteria for a significant contribution						Criteria regarding the DNSH principle ("do no significant harm")						Minimum safeguards	Participation of activities in line with the framework (A.1.) or eligible for the scheme (A.2.) Investment expenditure in 2023	Category: supporting activities	Transition activity category
	Code or codes	Capital expenditure	Percentage of expenditure investment projects, 2024	Climate change mitigation	Adaptation to climate change	Water and marine resources	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity				
A. ACTIVITIES ELIGIBLE FOR THE SCHEME		PLN thousand	%	T; N; N/EL	T; N; N/EL	T; N; N/EL	T; N; N/EL	T; N; N/EL	T; N; N/EL	T/N	T/N	T/N	T/N	T/N	Y/N	Y/N	%	E	T
A.1. Types of environmentally sustainable activities (in accordance with the classification system)																			
Data processing; website (web hosting) and similar activities	CCM 8.1	0.00	0%														0.15%		
Software, IT consultancy and related activities related	CCM 8.2	0.00	0%														51.75%		
Capital expenditure on sustainable (in accordance with the classification) (A.1)		0.00	0%														51.90%		
including support		0.00	0%														0%		
of which for transition		0.00	0%														0%		
A.2. Activities eligible for the scheme but environmentally unsustainable (activities not compliant with the scheme)																			
Manufacture of electrical and electronic equipment	CE 1.2	5,523.72	13.19%	N/EL	N/A	N/A	N/A	N	N/EL								0%		
Repair, modernisation and refurbishment of products	CE 5.1	244.29	0.58%	N/EL	N/A	N/A	N/A	N	N/EL								0%		
Installation, maintenance and repair of renewable energy systems renewable energy	CCM 7.6	38.80	0.09%	N	N/EL	N/EL	N/A	N/EL	N/EL								0%		
Transport by motorbikes, and light commercial vehicles	CCM 6.5	0.00	0.00%														14.61%		
Renovation of existing buildings	CCM 7.2	0.00	0.00%														0.16%		
Capital expenditure on activities eligible for the scheme but not environmentally sustainable (activities not in line with the scheme) (A.2)		5,768	13.87%	0.09%	0%	0%	0%	13.78%	0%								14.77%		
Capital expenditure on eligible activities for taxonomy (A.1+A.2)		5,768	13.87%	0.09%	0%	0%	0%	13.78%	0%								66.67%		
B. ACTIVITIES NOT COVERED BY THE CLASSIFICATION																			
Capital expenditure relating to activities not eligible under the classification		36,104	86.22%																
TOTAL		41,872	100%																

Capital expenditure calculated in accordance with Annex 1 to Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, based on the data presented in Note 1b, items 2a), 2b) and 2f) and Note 2b, items 2a) and 2b) to the Financial Statements.

Operating expenses

Operating expenses comprised all costs incurred in the day-to-day management of the Comp S.A. Capital Group's assets and in maintaining them in good condition. These included costs such as: costs associated with maintaining the proper functioning of buildings, equipment and production lines used by the Comp S.A. Capital Group. The portion of operating expenses relating to business activities falling under the following categories was allocated to the counter:

- CE 1.2 Manufacture of electrical and electronic equipment
- CE 5.1 Repair, modernisation and refurbishment of products

In the case of operating expenses which, in Commission Delegated Regulation (EU) 2021/2178, are defined in a manner not referring to international financial reporting standards, a review was conducted of all accounts in the Comp S.A. Capital Group's financial and accounting system, and subsequently, the items identified as meeting the definition of operating expenses were assigned in each case to the relevant type of activity eligible for classification or to the category of other operating expenses (not eligible for classification).

Furthermore, in accordance with the guidelines set out in the document 'Commission Notice on the interpretation of certain legal provisions of the delegated act laying down disclosure obligations pursuant to Article 8 of the EU Sustainable Development Taxonomy Regulation concerning the reporting of eligible economic activities and eligible assets (2022/C 385/01)', when calculating operating expenditure:

- only costs related to the maintenance and repair of tangible fixed assets were taken into account, including the costs of materials used in connection with the repair / maintenance / refurbishment of equipment, machinery or buildings, as well as the costs of Comp S.A. Capital Group employees or third parties carrying out the aforementioned work (where it was possible to reliably identify these costs in the Comp S.A. Capital Group's accounting records);
- costs related to the operation of tangible fixed assets, e.g. costs of electricity or consumables, or the costs of staff operating a given fixed asset, were not included.

When determining and allocating the value of individual operating expenses to the cost centre, the following assumptions were made:

- for costs related to buildings (i.e. cleaning, security or repairs), an allocation key based on the floor area of these buildings was adopted, with the floor area allocated to activities qualifying for the classification system and the remainder;
- for costs related to the maintenance of the vehicle fleet (i.e. purchase of spare parts and consumables, inspections and servicing), an allocation key was adopted based on the number of vehicles used in activities eligible for the classification and other activities.

In 2024, the Comp Group did not incur any costs related to short-term leases or the recognition of research and development expenditure directly as current period costs.

Table 20. Percentage share of operating expenses related to business activities compliant with the EU Taxonomy and business activities qualifying for the EU Taxonomy in 2024.

Financial year 2024	2024			Criteria for a significant contribution						Criteria relating to the DNSH principle ("do no serious harm")						Minimum safeguards	Participation of activities in line with the framework (A.1.) or eligible for the scheme (A.2.) Operating expenditure for the year 2023	Category: supporting activities	Category: transition activities
	Code or codes	Operating expenditure, 2024	Percentage of operating expenditure	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity	Climate change mitigation	Climate change adaptation	Water and marine resources	Pollution	Circular economy	Biodiversity				
A. ACTIVITIES ELIGIBLE FOR THE SCHEME		PLN thousand	%	T; N; N/EL	T; N; N/EL	T; N; N/EL	T; N; N/EL	T; N; N/EL	T; N; N/EL	T/N	T/N	T/N	T/N	T/N	Y/N	Y/N	%	E	T
A.1. Types of environmentally sustainable activities (in accordance with the classification system)																			
Installation, maintenance and repair of renewable energy technology	CCM 7.6	0	0%														0.05%		
Data processing; website (hosting) and similar activities	CCM 8.1	0	0%														1.26%		
Software-related activities, IT consultancy and related activities	CCM 8.2	0	0%														54.44%		
Operating expenditure on sustainable (in accordance with the classification) (A.1)		0.00	0%														55.75%		
including support		0.00	0%														0%		
of which for transition		0.00	0%														0%		
A.2. Activities eligible for the scheme but environmentally unsustainable (activities not compliant with the scheme)																			
Manufacture of electrical and electronic equipment	CE 1.2	1,285.91	13.9%	N/EL	N/A	N/A	N/A	N	N/EL								0.00%		
Repair, modernisation and refurbishment of products	CE 5.1	757.15	8.2%	N/A	N/A	N/A	N/A	N	N/EL								0.00%		
Transport by motorbike, car passenger cars and light commercial vehicles	CCM 6.5	0.00	0.0%														10.09%		
Operating expenditure relating to activities eligible for the scheme but not environmentally sustainable (activities not in line with the scheme) (A.2)		2,043.06	22%	0%	0%	0%	0%	22%	0%								10.09%		
Operating expenditure relating to activities eligible for the classification (A.1 + A.2)		2,043.06	22%	0%	0%	0%	0%	22%	0%								65.84%		
B. ACTIVITIES NOT COVERED BY THE CLASSIFICATION																			
Operating expenditure arising from activities not falling within the classification		7,220	78%																
TOTAL		9,263	100%																

Contextual information

The data used for the calculations was sourced from the Comp S.A. financial and accounting system and from the financial and accounting systems of the individual subsidiaries within the Group.

In 2024, the Comp Group re-examined all its activities in terms of classification and compliance with the classification system. As a result of the review, the following activities will not be reported in subsequent years:

- CCM 6.5 – “Transport by motorcycles, passenger cars and light commercial vehicles”;
- CCM 8.2 – “Software, IT consultancy and related activities”

During the analysis, no activities were identified that contributed to more than one environmental objective. There was therefore no need to apply special procedures to avoid double counting.

Contribution to multiple objectives

No activities contributing to more than one environmental objective were identified during the analysis.

Disaggregation of key performance indicators

The analysis has shown that there is no need to disaggregate key performance indicators in detail across the individual operating units of the Comp S.A. Group, in accordance with point 1.2.2.3 of Annex I to Commission Delegated Regulation (EU) 2021/2178. Further information on this subject can be found in the comments on the individual key performance indicators.

Disclosures indicating the extent to which the business is related to the activities listed in Delegated Act (EU) 2022/1214

As the Comp S.A. Group, we do not conduct, finance or have exposure to the types of activities referred to in sections 4.26–4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 (activities related to energy generation through nuclear processes and the production of energy from gaseous fossil fuels). Consequently, we do not include in this taxonomy disclosure note the disclosures required by Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022.

Table 21. Activities related to nuclear energy and natural gas.

Activities related to nuclear energy		
1.	The company conducts research, development, demonstration and deployment of innovative for electricity generation that produce energy through nuclear processes with minimal waste from the fuel cycle, and it finances these activities or has exposure to them.	NO
2.	The company is involved in the construction and safe operation of new nuclear facilities for the generation of electricity or process heat, including for district heating systems or industrial processes such as hydrogen production, as well as their safety-related modernisation, using the best available technologies, finances this activity or has exposure to it.	NO
3.	The company ensures the safe operation of existing nuclear facilities that generate electricity or process heat, including for district heating systems or industrial processes such as the production of hydrogen from nuclear energy, as well as their safety-related modernisation; it finances this activity or has exposure to it.	NO
Natural gas operations		
4.	The company is involved in the construction or operation of facilities for the generation of electricity using gaseous fossil fuels, finances such activities or has exposure to them.	NO
5.	The company is involved in the construction, modernisation and operation of combined heat and power and electricity using gaseous fossil fuels, finances such activities or has exposure to them.	NO
6.	The company is involved in the construction, modernisation and operation of heat generation facilities producing heat/cooling using gaseous fossil fuels, finances such activities or has exposure to them	NO

4. Information on social issues

People working for the company

The Comp S.A. Group has prepared this Report in accordance with ESRS standards for the first time; therefore, the definitions of the terms used in this chapter are set out below.

Definitions:

An employee is a natural person who is in an employment relationship with the Comp S.A. Capital Group in accordance with applicable national law or accepted business practice. This term covers both persons employed under an employment contract and those appointed to a position.

Non-employees are persons performing work for companies within the Comp S.A. Capital Group under civil law contracts (such as a contract of mandate or a contract for specific work) or external contracts.

Own employees are both employees and non-employees performing work for the Comp S.A. Capital Group.

[ESRS S1 SBM-2]

Stakeholder interests and views

Employees are a key asset of the Comp S.A. Capital Group, and their role in the organisation's success is particularly significant in the context of the specific nature of the IT industry and the retail sector. For an organisation operating at the intersection of modern technologies and a dynamic retail market, employees are the foundation of innovation, efficiency and the adaptation of the offering to changing market needs.

The Comp Management Board's openness to dialogue with employees and its consideration of their views in the process of setting strategic goals and reporting on sustainable development are important elements in building the organisation's resilience to changing market challenges. At the same time, they underscore the Comp S.A. Capital Group's ethical and responsible approach to conducting business.

Employees played a key role in the dual materiality study, which aimed to identify the most important areas of activity relevant to the Comp S.A. Group. Thanks to their commitment and expertise, it was possible not only to define the organisation's priorities but also to gain a deeper understanding of the challenges and opportunities within the context of its business operations.

As part of the materiality assessment, a survey was conducted among all employees of the Comp S.A. Capital Group. Its aim was to assess employees' internal perception of the organisation in the context of key areas of sustainable development, in line with non-financial reporting requirements. The questions allowed us to assess not only the extent to which specific norms and standards were being met, but also the level of awareness, engagement and actual actions taken in the areas of environmental, social and corporate governance.

The survey results provided guidance for planning strategic actions to support the organisation's development, including the achievement of sustainability goals.

[ESRS S1-1]

Policies relating to the Group's own workforce

Individual entities within the Comp S.A. Capital Group implement their HR policies through internal regulations. For example, work regulations (including rules on remuneration and bonuses) are in force at, amongst others, Comp S.A., Enigma SOI sp. z o.o. and Insoft sp. z o.o.

The provisions of these documents are designed to clearly define remuneration principles that support the recruitment, motivation and retention of key staff, senior management and other employees. In addition, the regulations governing the remuneration system serve to objectify pay criteria, which helps to prevent unequal treatment in this area. The cornerstone upon which policies relating to the Group's own staff are built is the Code of Ethics of the Comp S.A. Capital Group,

which applies at Comp S.A. and, in accordance with the principles adopted by the relevant bodies of Comp S.A.'s subsidiaries, also within those entities. As at 31 December 2024, not all companies within the Comp had implemented compliance documents. The Management Board of Comp S.A. is endeavouring to ensure that the established standards are implemented and applied in practice throughout the Comp S.A. Capital Group. The Comp S.A. Capital Group's system of ethical values comprises: respect, honesty, social responsibility, cooperation, business ethics, care for the environment, diversity and inclusion, professionalism, open communication, authenticity, empathy and courage. These values are based on the following international documents, and the company's Management Board undertakes to comply with them, namely:

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

The person responsible for overseeing the content of the Comp S.A. Capital Group Code of Ethics, for implementing procedures to communicate the Code of Ethics, and for the process of investigating reports of suspected or confirmed breaches of the Code of Ethics is the Compliance Officer.

In addition, the organisation has a Policy on Preventing Prohibited Conduct within the Comp S.A. Capital Group, which is available to employees via the internal systems of the individual entities within the Capital Group.

The purpose of introducing the Policy on Preventing Unacceptable Behaviour within the Comp S.A. Group is to prevent bullying, discrimination, harassment, sexual harassment and other forms of psychological or physical violence against employees of Comp S.A., based in Warsaw, and – in accordance with the rules adopted by the relevant bodies of Comp S.A.'s subsidiaries – also within those entities.

Issues relating to human resources are also covered by other policies and procedures:

- a) Comp S.A. Capital Group Compliance Policy,
 - b) Comp S.A. Breach Reporting Procedure,
- which are available on the website www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/

Compliance, understood as ensuring adherence to specific regulations and standards of conduct, is the responsibility of every employee within the Comp S.A. Group. The requirements regarding compliance with the law and ethical standards in force within the Comp S.A. Group go far beyond mere legal compliance.

The Compliance Policy constitutes a set of universal principles of conduct that apply across the entire Comp S.A. Capital Group. The principles contained in the Policy are detailed in internal documents. They are adapted to local and supranational legal regulations and business obligations.

Respect for human dignity is one of the pillars of the Comp S.A. Capital Group's operations and values. We strive to ensure a safe working environment in legal, ethical and emotional terms. We do not employ children. We oppose forced labour and human trafficking. We comply with legal regulations regarding the employment of our own staff, contractors and external workers, and we categorically oppose illegal employment and undeclared work.

We expect our suppliers to ensure that employees are hired and remunerated on the basis of fair and lawful contracts. In accordance with the Comp S.A. Supplier Code, we require that suppliers, as well as their employees and contractors, comply with legal requirements relating to employment. We respect the right of employees to form and join trade unions. We are guided by the principle of equal opportunities and equal treatment. We promote consultation and cooperation between the employer and employees and their representatives on matters of mutual interest.

We welcome everyone, regardless of gender, age, background, nationality, religion, sexual orientation, appearance, health, physical ability or any other characteristic. We believe that the potential

of diversity and its importance for the development of every company, its innovation and the creation of a friendly and harassment-free workplace is the key to success. We foster an organisational culture in which every individual feels respected and understood. In doing so, we build trust and strengthen bonds between employees, which enhances their satisfaction and commitment. We educate our staff on the benefits of diversity and teach them how to overcome prejudice. We strive to ensure that the workplace is free from stereotypes, which fosters harmonious cooperation and mutual understanding. Openness and respect for diversity attract talented professionals who are looking for companies with high ethical standards. This policy has a positive impact on our image and helps build our reputation as a responsible and inclusive employer. We provide an environment where every employee can feel safe and express themselves freely, which helps create cohesive teams and a friendly working atmosphere.

We oppose and take action against any conduct that constitutes misconduct. Further details on this matter are set out in the Comp S.A. Group Policy on Combating Misconduct.

An employee who has been harmed by conduct that constitutes unlawful behaviour, or who has knowledge of such conduct, is entitled to make a report. Reports should be made to the Compliance Officer. A report may also be made to a direct supervisor, provided it does not concern the supervisor personally. The supervisor to whom the report is made shall immediately forward its contents to the Compliance Officer. If the report is made verbally, it should be confirmed in writing. It is also possible to report prohibited conduct directly to a member of the management board or supervisory board of Comp S.A. Proceedings regarding a given report are conducted by a special committee. The first meeting on a given matter is convened no later than within 10 working days of the date of the report. Proceedings before the Committee are confidential. The Committee's task is to determine whether conduct constituting prohibited behaviour has taken place, to inform the Employer of the findings, and to recommend measures to the Employer aimed at preventing such conduct and eliminating its consequences.

Entities within the Capital Group have procedures and instructions in place to ensure health and safety at work, including the prevention of accidents at work.

The Group implements its human resources policy by:

1. Ensuring equality;
2. Improving working conditions, including terms of employment and pay;
3. Ensuring equal access to employee benefits;
4. Respecting employees' right to information and to express their opinions;
5. Developing employees' skills and competencies through various specialist training courses and consultations tailored to specific job roles at multiple levels of proficiency;
6. Providing regular health and safety training for employees;
7. Promoting an active lifestyle among employees and their families through access to various sports-related activities, in particular through organised company events and funding for sports programmes;
8. Assisting employees and their families in the event of difficult life situations.

The Management Board of Comp S.A. is responsible for implementing all these regulations, delegating specific tasks to the managers of individual organisational units or the governing bodies of entities within the Comp S.A. Capital Group.

[ESRS S1-2]

Procedures for engaging with the Company's own workforce and employee representatives on matters of influence

The parent company, Comp S.A., has introduced a "Whistleblowing Procedure", under which a mechanism is in place enabling any employee of the Comp S.A. Group to submit reports via the website using a dedicated electronic link from the online form available at: <https://www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/>

The mechanism ensures data protection, full confidentiality of reports and the anonymity of the reporting person.

Furthermore, entities within the Comp S.A. Capital Group are open to dialogue with employees, which is facilitated through direct contact between employees and their immediate supervisors, as well as consultations

internal documents relating to the Group's own employees and the employee representatives selected in accordance with the procedure adopted by the relevant employer (i.e. through a vote). The Group's own employees may contact the Compliance Officer, the Internal Auditor of the Comp S.A. Capital Group, and the governing bodies of the individual entities within the Capital Group directly. In view of the above, the Comp S.A. Capital Group has not introduced, nor does it plan to introduce, any formal procedures that would require the views of its own employees to be taken into account in the decision-making processes of individual entities within the Capital Group.

There is no separate position within the Capital Group dedicated to direct cooperation with its own employees. Furthermore, during the reporting period, none of the entities within the Capital Group entered into an agreement with representatives of employees, nor did they receive feedback from individuals particularly vulnerable to any form of discrimination or stigmatisation.

Cooperation with the Group's own employees is assessed as harmonious and in line with the values set out in ESRS S1-1.

[ESRS S1-3]

Processes for remedying the effects of negative impacts and channels for reporting concerns by the organisation's own workforce

The Comp S.A. Whistleblowing Procedure, adopted pursuant to Article 24 of the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws of 2024, item 928, as amended), clearly sets out the rules of procedure at every stage of the process, from the moment of reporting through to the conclusions following the investigation. Enigma SOI sp. z o.o. has a separate procedure. Other entities are not obliged to have internal procedures for reporting breaches, but may apply the procedure in force at Comp S.A. These procedures are available on the websites of these entities, i.e. <https://www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/> and [the rules on reporting and breaches by whistleblowers – Enigma](#). Furthermore, employees have the opportunity to raise their concerns and needs directly during discussions with their line managers.

In the case of Comp S.A., reports are directed to the Compliance Officer. The information channels specified in the reporting procedure ensure the confidentiality of information concerning the person making the report, as well as the completeness and integrity of the information, the possibility of storing it permanently, and the prevention of unauthorised access to it. Similar provisions are included in the procedure in force at Enigma SOI sp. z o.o., although reports are directed to a special committee, and the procedure does not provide for the option of reporting via a website.

Follow-up action is taken in response to every report. Follow-up action refers to measures taken to assess the accuracy of the information contained in the report and to address the regulatory breach that is the subject of the report, in particular by conducting an investigation, initiating an audit, or taking the appropriate legal steps provided for by the regulations.

Comp S.A. employees were informed of the adoption of the procedure and the reporting form via email and the intranet. Similarly, employees of Enigma SOI sp. z o.o. were informed of the adoption of the procedure. The remaining entities within the Comp S.A. Capital Group plan to voluntarily implement the relevant procedures in 2025.

The Management Board of Comp S.A. is working on a solution that will ensure that, from 2025, every new employee is informed about the possibility of reporting significant issues, concerns or suggestions as early as the induction (onboarding) stage.

The Comp S.A. Group does not engage in, and has never engaged in, any retaliatory actions. Retaliatory actions are defined as any direct or indirect act or omission in a work-related context that is caused by a report (internal or external) or public disclosure, and which infringes or may infringe the rights of the person making the report, or causes or may cause unjustified harm to that person, including the unjustified initiation of proceedings against them. Examples of retaliatory actions include discrimination, termination of an employment contract, transfer to another position, or a change in the scope of duties. All reports are verified for their validity and accuracy.

Where the report in question so requires, the Company shall provide support measures for the Reporting Person, such as psychological support. The Company shall ensure that Reporting Persons are protected, at a minimum, against repressive measures, discrimination or other forms of unfair treatment; in particular, making a Report shall not constitute grounds for termination of an employment contract, transfer to another post or a change in the scope of duties.

Entities within the Comp S.A. Group monitor reports made by the Compliance Officer and carry out periodic (at least once during the reporting period) reviews of the IT resources used as channels for reporting issues.

[ESRS S1-4]

Taking action regarding significant impacts on its own workforce and applying approaches to manage significant risks and capitalise on significant opportunities related to its own workforce, as well as the effectiveness of such actions

The Comp S.A. Group, operating in the IT and Retail sectors, is fully aware that in times of rapid technological change and growing market competition, people are the organisation's key asset. It therefore places particular emphasis on retaining highly qualified staff. To this end, it implements and continuously refines measures to retain talent within the organisation, based on discussions with employees, which allow the scope of these measures to be tailored to the team's needs and expectations. Specific measures are outlined below:

Training

In addition to compulsory training, employees have the opportunity to participate in additional courses that develop their knowledge and skills and are tailored individually in consultation with their line managers. Individual companies invest in staff training and reimburse language courses. Employees of the Capital Group are eligible for funding for postgraduate studies, provided the subject matter is related to their position and scope of duties.

Benefits

The Group also offers a wide range of benefits, such as health insurance, pension schemes and funding for education and professional development.

Health and work-life balance

Company boards recognise that ensuring the organisation's effective functioning in the long term requires supporting employees in maintaining a balance between their professional and private lives. Supporting employees in achieving satisfaction in various aspects of life, such as family, culture and health, is a key element of effective management for boards.

We place great emphasis on culture and family values, creating opportunities for our employees' families to socialise. Every year, we organise family picnics to mark Children's Day, packed with attractions and musical performances. Our employees and their children also take part in a variety of social initiatives, such as departmental meetings and New Year's events, and are involved in community activities. 2024 also marks the launch of a new project – 'Muzyczna Scena' – a series of concerts dedicated to Comp S.A. employees.

With employees' health in mind, a series of webinars on cancer prevention has been launched. This is just the first step in efforts aimed at educating and supporting employees in looking after their health. Webinars on mental health are also planned for the future.

Sports activities

The Comp S.A. Group supports physical activity and promotes a healthy lifestyle. Comp S.A. and Enigma SOI sp. z o.o. promote a healthy and active lifestyle by co-funding their employees' participation in various sports. In addition, in 2024, the first edition of a sports challenge was organised, encouraging Comp S.A. employees to engage in physical activity together.

The organisation actively protects employees' rights and ensures they have a safe and friendly working environment. A detailed description of the measures taken in this area can be found in earlier sections of the Report.

Thanks to its strong market position and diverse projects, the Capital Group provides stable, long-term employment, which fosters the professional development of its employees and contributes to their job satisfaction.

[ESRS S1-5]

Objectives regarding the management of significant negative impacts, the enhancement of positive impacts, and the management of significant risks and opportunities

The Comp S.A. Capital Group is considering developing a sustainable development strategy. In this case, issues and objectives relating both to the reduction of factors negatively affecting employees and non-employees, and to the strengthening of factors with a positive impact, will be analysed. The development of this document will be considered following the adoption of the Strategy for the Comp Capital Group entitled "Comp 2028 Security First" for the years 2026–2028.

[ESRS S1-6]

Characteristics of the entity's workforce

Within the Comp S.A. Capital Group, two main occupational groups can be distinguished based on the nature of the work performed: (i) employees and non-employees who are employed in administrative and office roles, and employees and non-employees who are employed in production roles (covering both software and goods).

1. Employees and non-employees who carry out administrative and office work are employed by Comp S.A., Enigma SOI sp. z o.o., Non Stop SOC sp. z o.o., Insoft sp. z o.o., Elzab Hellas SPV sp. z o.o., Elzab Hellas A.E., Micra-Metripod KFT, Comp Platforma Usług S.A.
2. Employees and non-employees performing production work are employed by Comp S.A., Enigma SOI sp. z o.o., Insoft sp. z o.o., and Micra-Metripod KFT.

The following section contains tables summarising key information about the employees of the Comp S.A. Group for 2024, based on data current as at 31 December 2024. It should be noted that, in order to align the data with ESRS standards, certain data categories cannot be compared year-on-year.

Table 22. Characteristics of the entity's employees – number of employees.

Breakdown of employees by gender			
	2023*	2024	year-on-year change
Women	282	286	1.42%
Men	728	724	-0.55%
Others	0	0	0.00%
Not disclosed	0	0	0.00%
Total	1010	1010	0.00%

* The data in Table 22 for 2023 include only figures from direct subsidiaries for that year.

Table 23. Characteristics of the entity's employees – breakdown of employees by country.

Breakdown of employees by country	
	Number of employees
Poland	988
Hungary	19
Greece	3
Total	1010

Table 24. Characteristics of the entity's employees – length of service.

Employees – length of service										
	2023					2024				
	Women	Men	Others	Not disclosed	Total	Women	Men	Others	Not disclosed	Total
Number of employees	282	728	0	0	1010	286	724	0	0	1010
Permanent staff	258	672	0	0	930	267	667	0	0	934
Fixed-term employees	24	56	0	0	80	19	57	0	0	76
Employees who are not guaranteed working hours	0	0	0	0	0	3	3	0	0	6
Full-time employees	257	631	0	0	888	257	628	0	0	885
Part-time employment	25	97	0	0	122	26	93	0	0	119

Table 25. Characteristics of the unit's staff – staff leaving the organisation.

Staff departures from the organisation*			
	2023	2024	change y/y
Number of employees who left	132	154	16.67%
Turnover rate	13.07%	15.25%	2.18%

* Staff turnover was calculated as the ratio of the total number of employees who left voluntarily, were dismissed, retired or died during the given period of employment to the total number of employees as at 31 December 2024.

[ESRS S1-9]**Diversity metrics**

The Comp S.A. Group promotes diversity among its employees and ensures a working environment free from discrimination. The tables below present detailed data on the organisation's employment structure in 2024, taking into account the age and gender of employees based on data current as at 31 December 2024.

Table 26. Diversity indicators – breakdown of employees by age.

Breakdown of employees by age					
Employees on employment contracts	Women	Men	Others	Not disclosed	Total
Number of employees, including:	286	724	0	0	1010
Age group: over 50	70	217	0	0	287
Age group: 30–50 years	183	385	0	0	568
Age group: under 30	34	122	0	0	155

Table 27. Diversity indicators – number of women and men in individual employee groups.

The number of women and men in each occupational group		
	Women	Men
Senior management	13	61
Managers and supervisors	26	79
Other employees	245	587
Total senior management + managers and supervisors	39	140

[ESRS S1-10]**Adequate pay**

In 2024, all employees of the Comp S.A. Capital Group received remuneration exceeding the established level of adequate remuneration.

Table 28. Adequate pay – appropriate pay.

Relevant wages*	
Percentage of employees receiving remuneration below the established level of adequate remuneration	0.00%
Percentage of employees receiving adequate pay	100%

*The level of remuneration at was benchmarked against the applicable minimum wage in Poland, the value of which, according to data from the Central Statistical Office (GUS), was PLN 4,242 gross from 1 January to 30 June and PLN 4,300 gross from 1 July.

[ESRS S1-13]**Indicators relating to training and skills development**

Information regarding training, education and the development of Comp S.A. Capital Group employees in 2024 is presented in the table below.

The table contains data on training and educational activities aimed at employees of the Comp S.A. Capital Group. The organisation consistently invests in the professional and personal development of its team, supporting their skills, effectiveness and motivation.

The table below also includes information on training for members of the Management Board of Comp S.A.

Table 29. Metrics relating to training and skills development.

Indicators relating to training and skills development				
	Women	Men	Others	Not disclosed
Average number of training hours per employee				
Senior management*	29	20	0	0
Managers and supervisors	40	7	0	0
Other employees	6	12	0	0
Average	10	12	0	0
Average number of training hours for non-employees				
Employees working under civil law contracts (contracts for services and specific-task contracts)	0	2	0	0
People on external contracts	0	8	0	0
Average	0	6	0	0
Training for members of the Management Board – average number of hours in 2024				
Management Board	0	17	0	0

* Senior management takes into account the training of Management Board members.

The Group does not conduct regular staff appraisals due to an organisational culture based on trust and autonomy. Employee appraisals are not carried out in a standardised or measurable manner. Instead, we focus on direct communication and involving employees in decision-making, which reduces the need for formal appraisals.

[ESRS S1-15]**Work-life balance indicators**

The table below shows the percentage of employees eligible for parental leave and the percentage of those who have taken advantage of this entitlement within the Comp S.A. Group.

Table 30. Measures of work-life balance.

Work-life balance indicators				
	Women	Men	Others	Not disclosed
Eligible for parental leave				
Number of employees eligible for parental leave	13	12	0	0
% of employees eligible for parental leave	4.56%	1.65%	0.00%	0.00%
Took parental leave				
Number of authorised employees who took parental leave	13	12	0	0
% of eligible employees who took parental leave	100.00%	100.00%	0.00%	0.00%

[ESRS S1-16]**Wage measures (wage gap and total remuneration)**

The table below shows the pay equity ratio for the Comp S.A. Group.

Table 31. Remuneration metrics – total remuneration ratio.

Total remuneration ratio	2024
CEO Pay Ratio*	17.52

*The CEO Pay Ratio is calculated as the ratio of the highest remuneration in the Group to the median remuneration of all employees, excluding the highest remuneration.

The Comp S.A. Capital Group offers its employees remuneration commensurate with their skills and experience, in line with prevailing market standards. When considering the ratio of men to women, it is important to take into account the specific nature of the IT sector and current market trends, where the predominance of men stems mainly from the demand for specific skills and industry-specific conditions. This situation poses a challenge in increasing the proportion of women in these departments. This is not the result of a deliberate recruitment policy, but a natural situation arising from the structure of the market. Recruitment processes within the Comp S.A. Capital Group are based solely on candidates' qualifications and experience, and the organisation does not employ mechanisms that influence gender ratios. This arrangement does not affect operational activities or the achievement of business objectives, and all personnel decisions are made in a spirit of transparency and equal opportunities.

Table 32. Remuneration metrics – pay gap.

Percentage difference in pay between women and men**	2024
Management Board*	N/A
Senior management	32.23%
Managers and supervisors	-8.43%
Other employees	18.09%

* The Management Board of Comp S.A. consists exclusively of men.

** The gender pay gap was calculated using the following methodology:

Monthly remuneration figures were converted to full-time equivalents and multiplied by 12 months.

1. In each employee group (i.e. the Management Board, senior management, managers and supervisors, other employees), the total remuneration was divided by the number of people in that group, taking into account the gender breakdown.
2. The resulting amount was then divided by the number of working hours applicable in Poland in 2024 (i.e. 2008 hours).
3. In the final stage, a formula in accordance with ESR S1-16 AR 98 was applied: the difference was calculated by subtracting the average gross hourly rate for women from the average gross hourly rate for men. The result was then divided by the average gross hourly rate for men.

Salaries have been reported as amounts actually paid, comprising fixed and contracted variable remuneration.

[ESRS S1-17]

Incidents, complaints and significant impacts on human rights

In 2024, no breaches of ethical standards relating to discrimination and bullying were reported within the Comp S.A. Group.

One anonymous complaint was submitted under the Whistleblowing Procedure, which was investigated by the Compliance Officer and appropriate corrective action was taken.

In addition, in 2024, one complaint relating to employment law was reported, which was also examined by the Compliance Officer, who took investigative and corrective action.

Throughout the reporting period, no cases of suspected human rights violations, discrimination or breaches of ethical principles among employees were recorded.

Monitoring of the OECD NCP and Business and Human Rights Resources Centre (BHRRC) reporting databases revealed no reports concerning the Group during the period from 1 January to 31 December 2024.

Consequently, the total amount of fines, penalties and compensation imposed on the Comp S.A. Group in 2024 was PLN 0.

Table 33. Incidents, complaints and significant impacts on human rights compliance.

	2024
Total number of cases of discrimination, including harassment, reported during the reporting period	0
Total number of complaints submitted via problem-reporting channels by the entity's own employees (including complaint-handling mechanisms)	2
Total number of complaints submitted to national contact points for the OECD Guidelines for Multinational Enterprises	0
Total amount of fines, penalties and compensation for damages resulting from incidents and complaints	0
Total number of serious human rights incidents involving the unit's workforce during the reporting period	0
Total number of significant human rights incidents related to the entity's workforce during the reporting period that constitute instances of non-compliance with the UN Guiding Principles on Business and Human Rights, the International Labour Organisation's Declaration on fundamental principles and rights at work, or the OECD Guidelines for Multinational Enterprises	0
Total amount of fines, penalties and compensation for damages resulting from human rights incidents related to the entity's workforce	0
Total number of significant human rights incidents in which the company played a role in providing remedies to those affected during the reporting period	0

5. Information relating to corporate governance

[ESRS G1-1]

Business Conduct Policies and Corporate Culture

The Comp S.A. Group operates in accordance with the law and the principles of professional ethics, and the implementation of corporate social responsibility and sustainable development principles is a key priority for the entities within the Group.

To this end, at the end of 2024, Comp S.A. updated its compliance documents, which define the Group's values and standards of conduct for employees and business partners, to ensure they apply consistently across the entire Group. These include, in particular: the Code of Ethics, the Anti-Corruption Policy, the Compliance Policy, the Conflict of Interest Management Policy, the Policy on Preventing Prohibited Conduct, and the Procedure for Reporting Breaches at Comp S.A. In addition, Comp S.A. has a Comp S.A. Supplier Code in place. The documents are available on the Comp S.A. intranet and website.

The Code of Ethics adopted at the Capital Group level serves as a guide to ensure compliance with the law, good manners, behavioural standards arising from the Capital Group's organisational culture, and generally accepted good practices. It serves as a benchmark for the ethical conduct of Comp S.A. Capital Group employees in their external relations as well as within the organisation. The Code of Ethics is not intended as a detailed code of conduct. The Comp S.A. Capital Group's system of ethical values comprises: respect, honesty, social responsibility, cooperation, business ethics, care for the environment, diversity and inclusion, professionalism, open communication, authenticity, empathy and courage. The Code of Ethics was last updated on 23 December 2024.

The adopted "*Anti-Corruption Policy of the Comp S.A. Group*" (hereinafter the "*Anti-Corruption Policy*") is set out in Section G1-3, "*Prevention and Detection of Corruption and Bribery*", and its purpose is to establish uniform rules and standards of conduct, the effect of which is to prevent and respond to acts bearing the hallmarks of corruption, and, in the event of abuse being identified, to prevent and counteract abuses committed to the detriment of the Company and actions inconsistent with the principles of conducting the Company's business in a transparent, ethical manner and in accordance with the rules of fair competition. The Anti-Corruption Policy was last updated on 23 December 2024.

The *Comp S.A. Capital Group Compliance Policy* sets out guidelines on compliance with laws and regulations and ethical conduct within the Company and the entities of the Capital Group. It serves to establish a strong and lasting foundation for successful cooperation with all its stakeholders and, consequently, for the sustainable development of the enterprise. The Compliance Policy was last updated on 23 December 2024.

Within the Comp S.A. Group, the "*Policy on Preventing Prohibited Conduct*" (hereinafter the "*Policy on Preventing Prohibited Conduct*") has also been in force since 23 December 2024, replacing the previously applicable "*Anti-Discrimination Policy*" and "*Anti-Bullying Policy*". Ultimately, the Policy on Preventing Prohibited Conduct is to be applied throughout the entire capital group and constitutes a set of rules defining the procedure for preventing bullying and discrimination, as well as the course of action to be taken should such incidents occur.

In 2024, no breaches of ethical standards relating to discrimination and mobbing were reported within the Capital Group.

The parent company of the Capital Group operates the "*Procedure for Reporting Breaches at Comp S.A.*" (hereinafter "*Whistleblowing Procedure*") for employees, suppliers and other stakeholders. It enables the Company's employees and external stakeholders to report breaches relating to its operations, including those concerning human rights. Individual entities within the Group may apply this procedure as appropriate to develop a uniform system for reporting irregularities, crimes and abuses within the Group, in which the Compliance Officer of Comp S.A. plays a key role, to whom all reports will be directed. The Violation Reporting Procedure was last updated on 20 November 2024.

The reporting channels specified in the procedure ensure the confidentiality of information concerning the person making the report, as well as the completeness and integrity of the information, the ability to store it permanently, and

the prevention of unauthorised access to such information. The online form allows reports to be forwarded directly to the Compliance Officer.

The Compliance Officer's responsibilities in the field of human rights include:

1. monitoring changes in the law, advising on newly introduced and existing legislation, codes of conduct and market standards.
2. identifying potential risks associated with applicable regulations.
3. implementing a whistleblowing system (Violation Reporting Procedure).
4. investigating reported breaches and incidents and supporting their detection.
5. responding to breaches in compliance with applicable law and corporate regulations.
6. Regular monitoring of compliance and updating of documentation and internal procedures.
7. cooperation with external entities, e.g. law firms.
8. Conducting training and educating employees and business partners on applicable requirements and regulations.
9. monitoring compliance with OECD guidelines, UN guidelines on business and human rights, and core conventions of the International Labour Organisation (in accordance with the principles of minimum ESG safeguards).

The Compliance Officer follows up on every report. Follow-up actions refer to measures taken to assess the accuracy of the information contained in the report and to address the regulatory breach that is the subject of the report, in particular by conducting an investigation, initiating an audit or taking the appropriate legal steps provided for by the regulations.

In 2024, one anonymous complaint was reported within the Capital Group under the Breach Reporting Procedure; this was examined by the Compliance Officer and appropriate corrective measures were taken. Furthermore, in 2024, one complaint relating to employment law was reported, which was also examined by the Compliance Officer, who took investigative and corrective action.

The Comp S.A. Supplier Code sets out the principles that every supplier working with Comp S.A. should follow. Compliance with these principles forms the basis for good, mutual business relations. The Comp S.A. Supplier Code was last updated on 23 December 2024.

Individual entities within the Capital Group have adopted, in accordance with applicable laws, their own accounting policies and procedures regarding the circulation of accounting documents, the invoice approval process and the recording of accounting documents, which are subject to periodic review by the Capital Group's Internal Auditor.

[ESRS G1-2]

Supplier relationship management

Comp S.A.'s approach to ethical management within the value chain is set out in the Comp S.A. Supplier Code. We are committed to working with suppliers who share our values and principles of corporate social responsibility (ESG). When selecting suppliers, Comp S.A. analyses the following issues in its relations with suppliers:

- a) impact on the environment (greenhouse gas emissions),
- b) human rights,
- c) labour rights (including, amongst others, provisions regarding worker safety, precarious employment, human trafficking, the use of forced labour or child labour),
- d) concern for consumers and end-users, society (social criteria) and local communities,
- e) compliance with regulations (including: fair tax practices),
- f) combating all forms of corruption,
- g) countering anti-competitive practices,
- h) the application of fair tax practices.

Every supplier is required to communicate the practices and principles set out in the Supplier Code to all their employees. Comp S.A. aims to ensure that the Supplier Code applies to every supplier, regardless of the nature of their business, the size of the supplier, the method of order fulfilment or their place of business. The

is addressed to suppliers, their employees and interested parties. Suppliers shall familiarise themselves with the Code and declare their compliance with the requirements set out therein in a separate statement confirming their familiarisation with the Comp S.A. Supplier Code

Individual entities within the Capital Group are free to adopt their own regulations concerning their own value chain. Any such regulations must be consistent with the values and principles set out in the Code of Ethics, the Anti-Corruption Policy, the Compliance Policy, the Conflict of Interest Management Policy and the Policy on Preventing Prohibited Conduct.

In 2024, entities within the Comp S.A. Capital Group did not conduct sustainability audits of their subcontractors and suppliers, but were subject to audits carried out by their partners.

The Comp S.A. Group does not have a policy aimed at preventing late payments. Payment practices are described in section *G1-6 Payment Practices* of this Report.

[ESRS G1-3]

Prevention and detection of corruption and bribery

In 2024, the Comp S.A. Capital Group introduced the “*Comp S.A. Capital Group Anti-Corruption Policy*” (hereinafter the “*Anti-Corruption Policy*”). The Anti-Corruption Policy is an extension of the “*Code of Ethics of the Comp S.A. Capital Group*”. The aim of the Anti-Corruption Policy is to establish uniform rules and standards of conduct designed to prevent and respond to acts bearing the hallmarks of corruption, as well as, in the event of identified misconduct, to prevent and counteract misconduct committed to the detriment of entities within the Comp S.A. Capital Group and actions inconsistent with the principles of conducting business in a transparent and ethical manner and in accordance with the rules of fair competition. The Anti-Corruption Policy is available on the intranet at <https://intranet.comp.com.pl/> and on the Comp S.A. website at <https://www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/>.

Integrity is one of the fundamental values upheld by the Comp S.A. Group. All employees, as well as Comp S.A. shareholders, business partners, suppliers, contractors and all other entities with whom the Comp S.A. Group has business dealings, must not engage in any form of corruption. This policy requires compliance with applicable law and the policies and procedures adopted by the Comp S.A. Capital Group (including the Compliance Policy and the Code of Ethics), as well as other internal regulations, applying a zero-tolerance policy towards corruption and bribery. It is prohibited to engage in any corrupt practices or other misconduct, whether in internal or external relations, regardless of whether such actions are undertaken directly or through third parties.

Educational initiatives are undertaken within the individual entities of the Capital Group, and employees and managers are required to comply with the law in order to mitigate the risk of corrupt practices and the risk of reputational damage to the companies resulting from allegations of corruption. There are plans to implement a common training platform in 2025, which will standardise educational activities within the Group and facilitate the reporting of non-financial indicators.

Matters relating to anti-corruption are monitored by the Compliance Officer, who maintains a dialogue on this subject with the Company’s Management Board and the Internal Auditor and has direct access to the Supervisory Board of the parent company of the Comp S.A. Capital Group.

The Management Board of Comp S.A. regularly assesses compliance with the principles set out in the Anti-Corruption Policy. The content of the Policy is updated both when the need arises and on the basis of conclusions drawn from the Policy assessments carried out. Entities within the Comp S.A. Capital Group regularly carry out an assessment of the risk of corruption occurring, covering all persons or entities associated with the entity in question to whom the Anti-Corruption Policy applies.

Suspected breaches of the Anti-Corruption Policy or other legal provisions may be reported in accordance with the applicable Whistleblowing Procedure. Employees may report breaches of internal procedures and regulations, including the Anti-Corruption Policy, legal provisions or the Code of Ethics, to their immediate supervisor; however, if this is not possible or, due to the nature of the matter, is inadvisable, they should contact the Compliance Officer at Comp S.A. directly, who will take

to investigate. If a breach is reported to a line manager, the latter is obliged to forward the report to the Compliance Officer.

In light of the above, risks of corrupt behaviour are identified and appropriate measures are taken, including, in particular, education and training in the area of compliance.

[ESRS G1-4]

Incidents of corruption or bribery

During the reporting period, the Comp S.A. Group did not record any proceedings being initiated or any convictions or fines being imposed for breaches of anti-corruption legislation or legislation on combating bribery. No incidents related to corruption were identified within the Group's entities, nor were there any dismissals or penalties imposed on employees in connection with corruption or bribery. During the reporting period, there were also no incidents concerning contracts with partners, and no legal proceedings relating to corruption or bribery were brought against the Comp S.A. Group or its employees.

Table 34. Confirmed cases of corruption and actions taken.

Confirmed cases of corruption and actions taken		
No.	Name	Number
1.	Total number and nature of confirmed cases of corruption	0
2.	Total number of confirmed incidents resulting in employees being dismissed or disciplined for corruption	0
3.	Total number of confirmed cases where contracts with business partners were terminated or not renewed due to corruption-related breaches	0
4.	Public proceedings concerning corruption brought against the organisation or its employees during the reporting period and the outcomes of those proceedings	0

[ESRS G1-5]

Political influence and lobbying activities

Supervision of the entire compliance area (including ensuring compliance with lobbying activities) is exercised by the Chairman of the Management Board with the assistance of the Compliance Officer; however, neither the Company nor the Comp S.A. Group engages in lobbying activities. Individual entities within the Group have a degree of discretion regarding how they implement compliance with the law and the Comp S.A. Group's policies, provided that they comply with the documents adopted at the Comp S.A. level. The Group has not made any financial or in-kind contributions of a political nature. None of the members of the governing bodies of Comp S.A. or the Capital Group's subsidiaries held a comparable position in public administration during the two years preceding such appointment in the reporting period. The Comp S.A. Capital Group is not legally obliged to be a member of a chamber of commerce or any other organisation representing its interests.

[ESRS G1-6]

Payment practices

The Comp S.A. Group pays close attention to timely payments in accordance with the Act of 8 March 2013 the Act on Combating Excessive Delays in Commercial Transactions (i.e. of 14 July 2023; Journal of Laws of 2023, item 1790, as amended). The Capital Group has in place appropriate accounting policies and relevant procedures regarding the circulation of accounting documents, the invoice approval process and the recording of accounting documents, the aim of which is to ensure a transparent, consistent and correct process for the circulation of accounting documents. Payment terms agreed in contracts generally do not exceed 60 days, in accordance with generally applicable legal provisions, as each entity within the Capital Group is classified as a large enterprise within the meaning of the Act of 8 March 2013 on counteracting excessive delays in commercial transactions. In exceptional cases, in dealings with other large enterprises, entities within the Capital Group may, following individual arrangements, apply longer payment terms; however, these do not exceed 120 days in any event. Consequently, there is no need for the Capital Group to adopt a separate policy regarding payment practices. In 2024, the Comp S.A. Group was not a party to any legal proceedings relating to late payments.

6. Specific disclosures

6.1 Cybersecurity

The purpose of this disclosure is to reflect the Comp S.A. Group's commitment to expanding its cybersecurity activities and ensuring transparency regarding cyber threats, in the interests of its stakeholders and the organisation. Specific metrics have not yet been defined, but their implementation is being considered for future reporting periods.

The cybersecurity market in Poland is growing at a rapid pace. In 2024, its value exceeded PLN 2.5 billion, and in the coming years, expenditure on this sector is set to grow by at least 10% annually (*Source: PMR Report 2024*). This growth is driven not only by the threats themselves, but also by regulatory changes, such as the new DORA (Digital Operational Resilience Act) regulations or the planned amendment to the Act on the National Cybersecurity System (KSC), which require companies and institutions to comply with stricter data protection and cyber risk management rules. Anticipated government and European measures, including those from the National Recovery Plan, are an additional factor favouring the development of this market.

In the coming years, cybersecurity will be a key area of activity for the Comp S.A. Thanks to its many years of experience in security systems, the Comp Group intends to expand its operations at a rate at least equal to market growth.

Digital transformation and the rise in threats mean that data protection is becoming an indispensable element of risk management. As an industry leader, Comp S.A. implements innovative solutions that provide companies and institutions with effective protection against cyberattacks and data loss. Investments in security have not only a technological dimension, but also an organisational and psychological one – they minimise stress, increase operational stability and improve team efficiency.

Proper monitoring and securing of systems build a sense of security within society and strengthen trust in digital technologies. Compliance with regulations such as DORA or the amendment to the Act on the National Cybersecurity System ('KSC') is becoming crucial for companies and institutions, whilst government and EU financial support is further accelerating the sector's development.

Due to its geopolitical location, Poland faces a growing risk of cyberattacks, which necessitates intensified efforts in this area. Protecting businesses, public institutions and critical infrastructure is becoming a priority, and the Comp S.A. Group is actively supporting their resilience to threats.

Growing awareness of the importance of cybersecurity means that companies treat it as a strategic element of their operations, affecting operational stability and reputation. The Comp S.A. Capital Group responds to these needs by providing modern technologies and supporting the digital resilience of businesses and the public sector.

In order to ensure the highest level of security and effective management of cybersecurity risks, the Comp S.A. Group consistently implements best practices and standards. Consequently, the companies within the Comp Group have obtained the relevant certificates confirming compliance with international standards for information security and quality management. Holding these certificates demonstrates the company's commitment to maintaining the highest standards of data protection and continuous process improvement, which ensures not only security but also the trust of customers and business partners.

The parent company, Comp S.A., holds:

1. Certificate of conformity of the Quality Management System with ISO 9001:2015, valid from 16 July 2024 to 11 November 2025. The scope of certification covers the design, sale and implementation of ICT solutions, the provision of maintenance and consultancy services, as well as the design, manufacture, sale and servicing of computer equipment, fiscal and non-fiscal devices, electronic scales, taximeters and software, together with training in these areas, the sale of automatic identification devices , point-of-sale systems , and payment and loyalty systems .

2. Certificate of conformity of the Information Security Management System with the PN-EN ISO/IEC 27001:2017-06 standard, valid from 30 September 2024 to 1 September 2025. The scope of certification covers the design, sale and implementation of ICT solutions, the provision of maintenance and consultancy services, the design, manufacture, sale and servicing of computer equipment, fiscal and non-fiscal devices, electronic scales, taximeters and software, together with training in these areas, and the sale of automatic identification devices, point-of-sale systems, and payment and loyalty systems. The certificate does not cover ELZAB, a subsidiary of the Sales Technology Centre Branch of Comp S.A.

The requirements of the above certificates are reflected in the Integrated Management System Manual implemented within the parent company, the purpose of which is:

1. document the operating principles of the Quality and Information Security Management System at Comp S.A.;
2. provide employees comprehensive information about the Quality and Information Security;
3. focusing employees on the need to meet customer requirements;
4. presenting the rules, procedures and principles applied to ensure information security within the Company;
5. informing external customers, certification bodies and partners about how the Company ensures the appropriate quality of products and services and how it safeguards the confidentiality, integrity and availability of information.

The following documents supplement the Integrated Management System Manual and form part of it as annexes:

1. The Quality Policy, constituting a commitment to the continuous improvement of our products and services;
2. Information Security Policy, constituting a commitment to protect information in order to ensure its integrity, availability and confidentiality at every stage of processing;
3. process map;
4. the defined organisational structure and list of internal units of Comp S.A. covered by the information security management system and the quality management system;
5. a declaration of compliance with the ISMS.

The Management Board of Comp S.A. is responsible for establishing, implementing, developing and continuously improving the Integrated Management System.

The Quality and Information Security Policies have been communicated to all employees as part of the training programme and are available to all interested parties via the intranet.

The Management Board of Comp S.A. has appointed a Management Board Representative for Quality and a Management Board Representative for Information Security to ensure that the quality and information security management systems are properly documented, implemented and effectively managed and maintained.

The following entities within the Group also held certified quality management systems valid until 31 December 2024:

1. Enigma Systemy Ochrony Informacji sp. z o.o.:
 - a) Certificate of conformity of the Quality Management System with ISO 9001:2015 and Certificate of conformity of the Information Security Management System with PN-EN ISO/IEC 27001:2017-06 in the field of design, manufacture, sale, integration, implementation, maintenance and servicing of: software, electronic devices and ICT systems, including analytical, consultancy and training services, as well as trust services, including services related to electronic signatures.
 - b) Certificate of conformity of the Quality Management System with the ISO 9001:2015 standard in the field of design, manufacture, sale and servicing of electronic devices and cryptographic systems.
2. Insoft sp. z o.o.:
Certificate of conformity of the Quality Management System with ISO 9001:2015 in relation to the design, development, delivery and implementation of software.

These certificates are available on the websites of the individual entities within the group.

Although there has been no data breach within the Group to date, and the systems in place provide a solid foundation for protection, the risk of such an incident remains. Of particular significance is the fact that, as an organisation, we specialise in providing data security systems – a breach of data integrity could not only constitute a serious technical problem, but also significantly undermine the Group’s reputation and the trust of our customers. Threats arising from human error, sophisticated cyberattacks or cooperation with external entities require constant attention from the Comp S.A. Group.

To effectively minimise the risk of incidents, we implement the following measures:

- **Organising training for employees**
Regular workshops and training sessions on recognising threats, such as phishing or social engineering techniques, help to raise the team’s awareness and competence.
- **Advanced monitoring and analytics**
We use monitoring systems that enable the rapid detection of anomalies in network traffic and user activity.
- **Secure data management with external partners**
We ensure compliance with security standards, sign NDAs and implement data segmentation to minimise the risks associated with working with external parties.
- **Regular security audits**
We conduct audits to assess the effectiveness of the solutions implemented and to identify potential security vulnerabilities.
- **Incident response plan**
We have developed and are testing a detailed incident response plan, which allows us to quickly and effectively minimise the impact of incidents should they occur.

Thanks to these measures, the Comp S.A. Group is able to better protect data and strengthen the trust of its customers.

Our approach to data and intellectual property protection stems from a deep conviction that customer trust and the company’s reputation are key to long-term success. That is why we continuously invest in the development of our staff, the improvement of tools and the updating of security procedures to meet the growing challenges and threats in a rapidly changing digital environment.

6.2 Geopolitical situation

The Group’s objective is to continue developing measures to strengthen data security, information systems and critical infrastructure, and to counter growing geopolitical threats and cyberattacks, thereby ensuring the continuity of operations. At present, the metrics for achieving this objective have not been defined, and due to the volatility of the situation, it is difficult to estimate the scale of growth.

In recent years, the geopolitical situation has created considerable uncertainty, which is having a significant impact on market behaviour and investment strategies worldwide. In response to growing risks, particularly in the areas of data protection, information systems and critical infrastructure, we are seeing an increase in demand for modern security systems. Increasing geopolitical tensions, including state-sponsored cyberattacks and the rising risk of terrorism, are prompting organisations – including public institutions – to take steps to strengthen the security of their systems.

There is a growing awareness of threats that could have serious consequences for both the public and private sectors. Consequently, modern data management technologies and information security and data processing systems have become a key element of strategies to protect against cyber threats. In the face of growing geopolitical uncertainty and cyber threats, these technologies are becoming essential for maintaining the continuity of operations and protecting data from unauthorised access.

From the perspective of the Comp S.A. Group, which serves key clients in sectors such as central and local government (the public sector) and large businesses, including those in the banking and insurance sectors, the growing demand for security solutions presents enormous opportunities. It is predicted that expenditure on data security in these sectors will grow rapidly, particularly among public institutions and companies managing critical infrastructure. Banks and insurers, as the main drivers of data protection expenditure, will remain key players in the market, investing in modern information security technologies.

The public sector, including institutions responsible for managing critical infrastructure, is also becoming increasingly aware of the need to protect its systems and data from external threats. Increased investment in security systems in this sector is inevitable in order to meet new geopolitical challenges and cyber threats. In this context, the Comp S.A. Capital Group sees a significant opportunity for further growth in the provision of innovative solutions in the field of cybersecurity and data management.

6.3 Customer relationship management

The aim of the Comp S.A. Group is to establish lasting and mutually beneficial relationships with partners in the IT sector and the retail and services sectors, enabling the effective implementation of innovative technological solutions, supporting business development and caring for the natural environment. The Comp S.A. Capital Group actively cooperates with technology partners in the IT sector and with business partners in the retail and services sectors, focusing on long-term and mutually beneficial relationships. No specific metrics have been defined in this regard, but their adoption is being considered for future reporting periods.

Our retail dealer network comprises carefully selected partners who possess the necessary knowledge and experience to provide professional advice, install and service the fiscal devices we offer. As part of this partnership, dealers receive comprehensive support – ranging from attractive commercial terms and conditions, through technical and product training, to marketing and after-sales support. Partners receive the necessary support and tools to help them grow their business and increase sales, whilst contributing to the implementation of modern, environmentally friendly technological solutions.

We are also a valued partner in Professional Services programmes for leading global providers of networking and security solutions. Our commitment means we possess the highest levels of expertise, certifications and access to our partners' resources and technological know-how. As a result, clients receive support in delivering the most demanding projects at every stage of implementation – from needs analysis, through deployment, to ongoing maintenance and system optimisation. We monitor and optimise partnership levels, ensuring we maintain the highest statuses in manufacturers' programmes, which translates into additional benefits for our clients. We engage in joint research and development activities, testing new solutions and bringing them to market. We organise joint webinars and industry events to raise awareness and demand for our partners' solutions. Diversifying the organisation's product range enables flexible sales management – declines in one category are offset by growth in other areas of operation.

[ESRS 2 IRO-2]

Disclosure requirements under the ESRS covered by the entity's sustainability statement

ESRS	Name	Page
ESRS 2 General disclosures		
BP-1	General framework for preparing sustainability statements	74
BP-2	Disclosure of information in relation to specific circumstances	75
GOV-1	The role of administrative, management and supervisory bodies	76
GOV-2	Information provided to the entity's administrative, management and supervisory bodies and matters relating to sustainable development addressed by them	80
GOV-3	Incorporation of sustainability performance into incentive schemes	81
GOV-4	Due diligence statement	81
GOV-5	Risk management and internal controls over sustainability reporting	82
SBM-1	Strategy, business model and value chain	82
SBM-2	Stakeholder interests and views	87

SBM-3	Significant impacts, risks and opportunities, and their interrelationships with the strategy and business model	91
IRO-1	Description of the process for identifying and assessing significant impacts, risks and opportunities	96
IRO-2	Disclosure requirements under the ESRS covered by the entity's sustainability statement	96
ESRS E1 Climate change		
E1-1	Climate change mitigation transition plan	97
E1-2	Policies relating to climate change mitigation and adaptation	97
E1-3	Actions and resources relating to climate policy	97
E1-4	Climate change mitigation and adaptation targets	98
E1-5	Energy consumption and energy mix	98
E1-6	Gross greenhouse gas emissions from Scopes 1, 2 and 3, and total greenhouse gas emissions	99
E1-7	Greenhouse gas removal and emission reduction projects financed through carbon credits	Not applicable
E1-8	Setting internal carbon prices	Not applicable
E1-9	Expected financial impacts arising from material physical and transition risks and potential climate-related opportunities	Transition period
ESRS E5 Resource use and the circular economy		
E5-1	Policies relating to resource use and the circular economy	104
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Appendix to the Management Board's Report on the Activities of the Comp S.A. Group in 2024:
Statement by Comp S.A. on the application of corporate governance principles in 2024.

Signatures of all Members of the Management Board of Comp S.A.

Date	First name and surname	Position	Signature
15 April 2025	Robert Tomaszewski	Chairman of the Management Board	<i>Document signed electronically</i>
15 April 2025	Krzysztof Morawski	Vice-Chairman of the Management Board	<i>Document signed electronically</i>
15 April 2025	Jarosław Wilk	Vice-Chairman of the Management Board	<i>Document signed electronically</i>
15 April 2025	Andrzej Wawer	Vice-Chairman of the Management Board	<i>Document signed electronically-</i>