

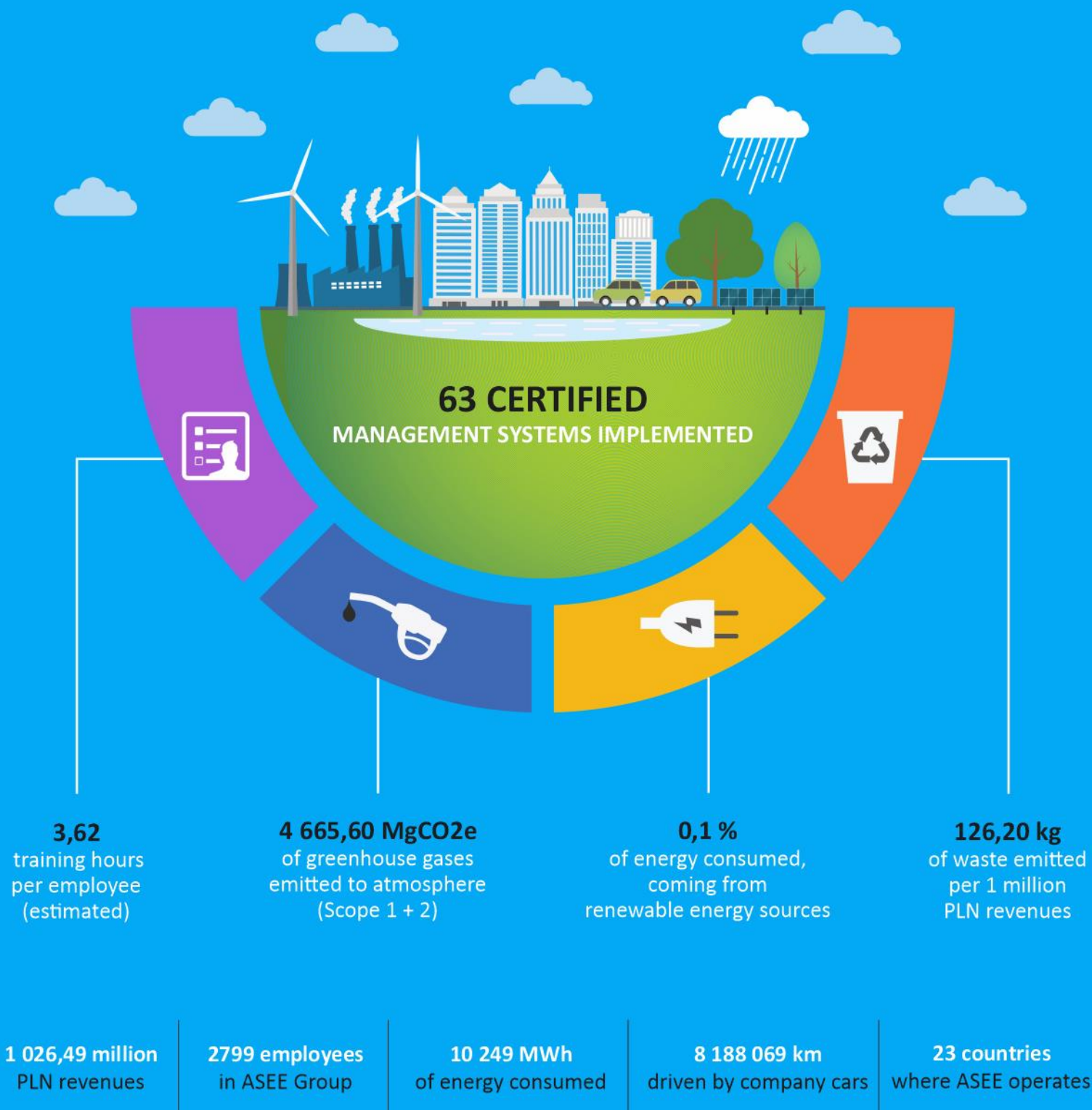


Asseco South Eastern Europe Capital Group 2020 Non-Financial Report

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Summary of Non-Financial Information for 2020





Letter from CEO

Dear Stakeholders,

I am pleased to present to you our first standalone non-financial report. 2020 was the best year in the history of ASEE Group, including Payten, in terms of financial results achieved. I strongly believe that this success was possible also thanks to the way we conduct business, our respect to the employees, societies where we operate, clients and partners. We have already been presenting our non-financial information before but only as part of Asseco Poland report. This year's new format allows us for a more comprehensive content, meeting at the same time the SIN standard.

We aim to conduct business based on our core values i.e. Integrity, Respect and Credibility. Sustainability fits into this and it is difficult to imagine today how to pursue business activity without having this in mind. In 2019 we considered Sustainable Development Goals with the purpose to set key directions and build understanding of how our business influences the planet and societies. We agree with many who believe that in the near future there will be a significant reallocation of capital, with sustainable finance being the future of investment markets. Change in investors' behaviors offers some threats and opportunities. As we are committed to be a 'green' company, we needed a framework which will support delivery of our sustainability oriented plans. Therefore we have decided to publish our first non-financial report, ahead of forthcoming regulatory requirements.

I personally commissioned and supported preparation of our first non-financial report. We started with materiality analysis of our operations to determine the scope of the report. We set up a competent team which focused on data gathering and monitoring. Whilst we are conscious that we may improve completeness of our data, as we are in the beginning of sustainability road, still we decided to report Scope 3 GHG (greenhouse gas) emissions from the beginning. We will continue to extend categories included in Scope 3 reporting. We prepared Environment Policy, including climate issues. In Q1 2021 we aim to implement it across the ASEE Group. The sustainability team will work continuously, with quarterly reporting to the Management Board. One of our key objectives will be to ensure our 2021 report is fully compliant with the EU Taxonomy.

Last year was special to all of us due to global Covid-19 pandemic. This challenge has put additional requirements on how we make business and care about others. Therefore we decided that 2020 was not a proper baseline to set targets for our non-financial KPIs (Key Performance Indicators). We precisely defined what measures we want to use as KPIs. This will give us a clear guidance when we prioritize our actions. We will continue to report on these measures. But we believe that setting specific targets on the basis of such exceptional year would be impractical.

Our approach

In 2020 we considered many of recommendations within the sustainability area:

- UN Sustainable Development Goals
- EU Directive 2014/95/EU regarding disclosure of non-financial and diversity information
- Regulation (EU) 2019/2088 on Sustainable Finance Disclosure Regulation (SFDR)
- Recommendations of TCFD (Task Force on Climate-Related Financial Disclosures)
- Best Practice of GPW Listed Companies 2016
- The Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment (Taxonomy Regulation)

We have agreed ASEE Corporate Social Responsibility/Sustainability Strategy and Plan. For reporting we initially intended to apply GRI Sustainability Reporting Standards.

Our plan assumed the report would cover our companies operating in all countries. To determine best approach to prepare our first non-financial report we participated in consultations with SEG (Association of WSE

Issuers) and FSR (Foundation for Reporting Standards). We also reviewed Climate Crisis Awareness 2020 corporate study to understand possible approaches to reporting and good practices. “How to improve climate-related reporting” report published by EFRAG (European Finance Reporting Advisory Group) also provided very useful insights on good reporting practices.

We realize that monitoring all relevant data and preparation of the report is a challenge for every company. In the ASEE Group we have some small companies with very limited resources to support the reporting process. As we didn't want to exclude any companies from the reporting scope, we decided to simplify the approach. Therefore we selected SIN (non-Financial Information Standard) developed by FSR (Foundation for Reporting Standards). We understand that 2021 brings new SFDR requirements, which affect reporting standard. We participated in consultation of the new reporting standard which will be issued in 2021. We strongly believe that one market-wide reporting standard supports transparency and comparability of provided information, as well as makes the reporting process simpler because reporting companies prepare information once for all stakeholders. Such new market standard will be beneficial for both investors and reporting companies.

Our performance

I hope that you will find our first non-financial report interesting. From this report you will learn what key-performance indicators we have selected as important to monitor and report by our company. I believe that the report comprises comprehensive information on how we approached managerial, internal control, ethical, environmental, product safety, employee, social and anti-corruption issues as well as marketing communication in 2020 and what results we have achieved in these areas. Let me finish with a summary of our key non-financial performance indicators. As a company employing 2799 people in 23 countries and having generated over PLN 1 billion sales revenues in 2020, we have 63 certified management systems implemented, 10 249 MWh of energy consumed, out of which 0.1% coming from renewable energy sources, 4 665,60 MgCO₂e of Scope 1 & 2 greenhouse gases emitted to atmosphere, 126,20 kg of waste emitted per 1 million PLN revenues, 8 188 069 km driven by company cars and 3,62 training hours per employee delivered.

We are at the beginning of our sustainability journey and we are committed to continue our efforts to run more sustainable business each year.

Piotr Jeleński

CEO, Asseco South Eastern Europe



3. Business Model and Corporate Governance

ASEE S.A. conducts mainly holding activities, focusing on managing the Group and expanding its geographical and product range. Due to the fact that the Parent Company mainly conducts holding activities, the directions of the Company's development should be considered in the context of the development and operations of the entire ASEE Group.

The ASEE Group is active in the sale of proprietary and third-party software, as well as the provision of implementation, integration and outsourcing services.

The Group distinguishes the following reporting segments reflecting the structure of its operating segments:

- Banking sector solutions,
- Payment solutions (operating under Payten brand),
- Dedicated solutions.

3.1. THE COMPANY'S GROWTH STRATEGY AND DEVELOPMENT DIRECTIONS

G.1.1.

In 2021, the ASEE Group (incl. Payten) intends to focus on further independence of each of the Group's operating segments, adapting the strategy to the opportunities and growth prospects of each segment in the current and new geographic areas, offering its own software in the form of subscription and outsourcing.

For several years now, the main task of ASEE's Sales Department (incl. Payten) has been the development of new markets and greater support for the most promising products and solutions. The Group continues investments in resources necessary to service international clients with centralized structures, present in the ASEE and Payten regions.

In 2021, the Group intends to continue sales activities aimed at increasing revenues both from the current area of operation, including Central, South-Eastern Europe, Spain, Portugal and Latin America, as well as from new markets.

Summary of goals for 2021 in the area of banking and dedicated solutions:

- Further increasing the share of own products and services in the sales structure of the ASEE Group.
- Selective investments in the development of new IT products.
- Offering selected solutions in a subscription model (SaaS).
- Increasing the value of sales by entering new markets, understood both as new geographies and markets within the current area of the Group's operations.
- Increasingly better use of the geographical and operational scale of the Group's operations by further coordinating resource management, product development, and relationships with key customers and suppliers.
- Improving the efficiency of operations through better project management and optimization of the customer support area.

Summary of goals for 2021 in the area of payments - Payten:

- Expanding the Payment Solution with new services and products through organic growth and acquisitions, also outside the current geographical area of the Group's operations.
- Further development of the business line offering eCommerce solutions. Investments in the Payment Gateway solution and intensification of sales of the MSU solution;
- Development of a business line offering payment solutions directly to retail outlets, providing customers with the comfort of working with only one supplier in the entire area.
- Offering new Payten solutions in the entire region of the Company's operations and in new markets beyond the current area of Payten's operations.

- Sustainable development of an independent network of ATMs operating under the MoneyGet brand.
- Continuation of the promotion of the Payten brand, under which the segment operates.

3.2. BUSINESS MODEL

G.1.2.

The ASEE Group's business model is based on the following assumptions:

Strengthening a coherent corporate structure

The ASEE Group was established through acquisitions and integration of IT companies operating in the markets of South-Eastern Europe and Turkey. Thanks to the acquisitions of Necomplus and Sonet carried out in 2019, the geographical scope of ASEE's operations (incl. Payten) was expanded to include Spain, Portugal, Peru, Colombia, the Czech Republic and Slovakia. At the beginning of 2020, a company that offers Payten products on the Egyptian market was registered.

As a result of activities aimed at deepening the integration of the acquired entities, the ASEE Group transformed from a loose federation of companies into a coherent corporate structure with a multi-dimensional management structure based on:

1. Geographies
2. Products / competencies
3. Features

The geographic dimension of management is based on national structures.

The Competence Dimension is based on the main business segments:

- Payment solutions (operating as Payten)
- Solutions in the banking sector
- Dedicated solutions (including the sale of own services and solutions of external suppliers).

The Functional Dimension relates to the processes carried out as part of key functions in the organization (sales, research and development, project implementation, support, HR, marketing, finance and legal issues).

The Functional and Competence Dimension along with the relevant standards is centralized and covers all geographies.

Improving the efficiency of Operations

One of the key elements of the Group's management is the unification of standards for project management and implementation resources.

Gradually, international implementation teams dedicated to the implementation of selected types of projects in the areas of mobile solutions and the Digital Edge multi-channel electronic banking platform, as well as solutions for the sale of financial products via Digital Origination / digital channels are being established.

Thanks to the standardization of measures and tools, it has become possible to set goals based on selected operational efficiency indicators and to associate them with the remuneration of persons responsible for Operations, consistent across the Group.

Work on improving the efficiency and unifying the standards and tools used in the implementation of projects additionally accelerated due to the pandemic situation in 2020 and the need to work remotely. ASEE Group, including Payten, is well prepared to implement the remote working model and we did not notice any significant delays in project implementation due to this.

Focus on strategic products and services

Focus on the development of strategic products allows for greater dynamics of revenue growth from own solutions.

In the process of further development of ASEE, the Management Board plans to continue to focus on expanding and increasing the importance of the portfolio of its own products and services. This means, among other things, the need to focus more on the key competences for the Group, which may in turn entail the need to resign from offering selected solutions, the importance of which is not strategic for ASEE.

In the long term, the Group plans to offer several key solutions on a global scale, in areas where the competences of ASEE and Payten allow it to compete with the largest suppliers on the market.

Regardless of the plans to focus on key products, the Management Board intends to use the strong position of ASEE and Payten in the region, its knowledge and experience, as well as good contact with regional customers, in order to build the competence of a professional advisor and service provider for the Group's significant customers.

Entering new markets

Increasing sales requires increasing the share of revenues from markets beyond the current area of the ASEE Group's operations, while supporting the growth with acquisitions. In the long term, the Company plans to develop sales outside South-East Europe and Turkey, primarily by creating a network of partners cooperating with ASEE and Payten.

As part of the Payment Solutions segment (Payten), the Management Board assumes the possibility of going beyond the current region of the Group's operations also through acquisitions of companies whose offer would be complementary to the current portfolio of solutions sold under the Payten brand.

The strategic goal of ASEE, including Payten, remains to become one of the three largest and most recognizable players in each of the markets in which the Group operates.

3.3. MANAGEMENT STRUCTURE

G.2.1.

As at the date of publication of this report, i.e. as at February 24, 2021, the composition of the Management Board and Supervisory Board of the Company and the Audit Committee was as follows

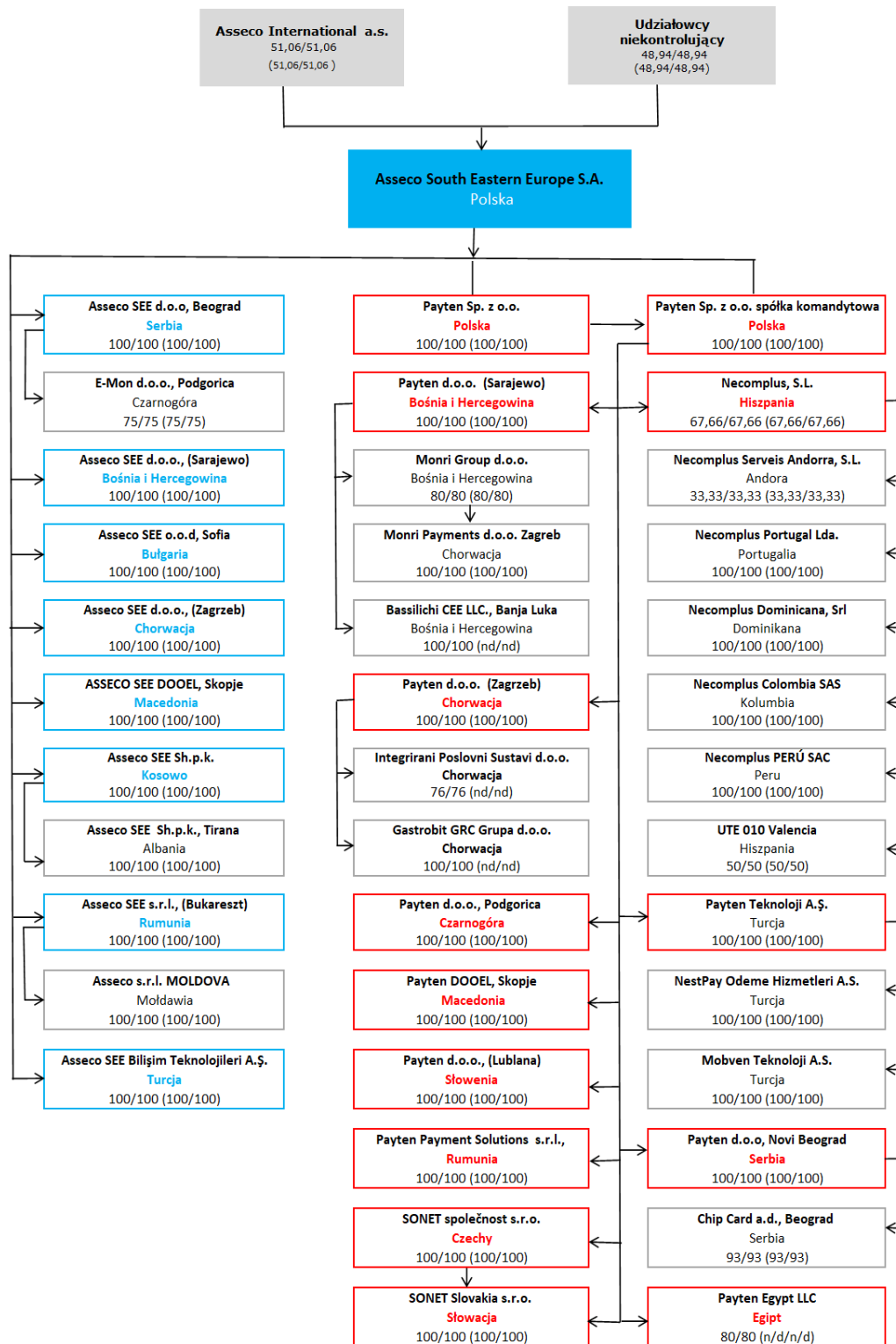
<u>Supervisory Board</u>	<u>Management Board</u>	<u>Audit Committee</u>
Jozef Klein	Piotr Jeleński	Artur Kucharski
Adam Góral	Miljan Mališ	Adam Pawłowicz
Jacek Duch	Marcin Rulnicki	Jacek Duch
Artur Kucharski	Kostadin Slavkoski	
Adam Pawłowicz		

Sustainable development issues related to ESG areas (Environment - Social - Governance) are of interest to the Management Board. In order to systematize the issues of sustainable development in the ASEE Group, the Management Board decided to publish this non-financial report for 2020. The intensification of the

Group's activities in this area is one of the key tasks of the new managerial position established in 2020. The next step is to nominate a person responsible for the coordination of ESG activities in each company.

As part of the materiality test, the Company's Management Board analyzed non-financial data and decided to select key non-financial performance indicators.

3.4. CAPITAL GROUP



100/100 udział w głosach/udział w kapitale na dzień 31 grudnia 2020 roku (w %)
(100/100) udział w głosach/udział w kapitale na dzień 31 grudnia 2019 roku (w %)

3.5. MANAGEMENT SYSTEMS

G.2.2.

ASEE as holding company in Poland does not perform significant operational activities in Poland. Its role is mainly to perform management and control functions towards all subsidiaries in the Group.

Companies of ASEE Group (including Payten) operate in various geographies in the European Union and outside the EU. Various business lines require different management systems and are subject to different local regulations. For these reasons ASEE Group has not implemented a uniform Management System for the entire Group.

Implementation of adequate management systems is a responsibility of management boards of local companies. Maintenance of these systems is essential to ASEE Group business. In addition to internal focus on proper management practices, there are many clients who require adequate certifications. This is in particular essential in payment processing.

Almost all ASEE Group companies implemented various management systems. In total ASEE Group companies hold more than 60 attestations. Several ASEE Group companies (including Payten) hold ISO 9001: 2015 (Quality Management System), ISO 20000: 2011 (Service Management System) and ISO 27001:2013 (Information Security Management System). Several companies also implemented ISO 14001: 2015 (Environmental Management System). Payment processing companies also secured many attestations of compliance from organizations like e.g. PCI (Payment Card Industry), VISA and Mastercard.

As the scope of ASEE Group services expands, the number of management systems certificates constantly increases. The information about all attestations is maintained centrally and certificates are regularly renewed. Many certificates are due for renewal in 2021.

As environmental issues require more management attention, ASEE Group will seek to secure ISO 14001: 2015 (Environmental Management System) in all its significant operations. This may be a challenge in some non-EU countries.

3.6. INTERNAL CONTROL SYSTEM

G.2.3.

Internal control system relies primarily on responsibilities of statutory bodies and main central functions, as defined by law and internal regulations. The ASEE governance structure provides clear segregation of duties which contributes to effective communication, decision making process and efficient operations.

Ultimate control responsibility rests with the Supervisory Board which oversees ASEE Management Board. ASEE Board manages directly ASEE SA activities and - more importantly – appoints supervisory boards of local subsidiaries. Consequently local subsidiaries management boards have clearly defined control responsibilities. All these control functions of statutory bodies result directly from provisions of law. Compliance with these laws is regularly reviewed.

These statutory bodies are supported by Group functions, which have some control responsibilities defined in internal procedures. They also provide advice to statutory bodies. Finally local management boards are also supported in control activities by local operational management team. Local procedures cascade some control functions on operational managers. In each company where a management system has been implemented, e.g. ISO, there is an indicated employee responsible for ensuring the compliance of the company's operations with the adopted management system. This top down approach to control works effectively as confirmed by both external and internal audits.

In scope of ESG, as part of internal control, the ASEE Group monitors compliance with the requirements of ISO 14001 in companies that have already implemented this standard.

The procedures governing the internal control system do not provide for special regulations relating to non-financial matters.

In addition to control functions performed by management structures, the Company established additional bodies committed to auditing operational management practices, control processes and risk management effectiveness. At the level of the Supervisory Board, an Audit Committee was appointed, which in particular:

1. verifies the adequacy and effectiveness of risk management and internal control,
2. verifies the effectiveness of supervision of the compliance of the Company's operations with the law,
3. assesses the effectiveness of risk management systems, internal control and compliance as well as the internal audit function,
4. assesses the adjustment of the Company to the observations, positions and decisions addressed to the Company by the external auditor or other entities that supervise the activities carried out by the Company.

The Audit Committee is supported by the Group Internal Audit Manager who:

1. prepares an annual plan of internal audits
2. carries out internal audits in cooperation with relevant employees of local companies
3. drafts a report with audit conclusions and recommendations
4. monitors the implementation of recommendations

Finally the internal control system is supplemented by external auditors.

3.7. SOCIAL AND ENVIRONMENTAL RISK MANAGEMENT

G.3.1.

Risk management framework is extended across the ASEE Governance structure addressing financial and non-financial risks. There is no specific risk management framework to manage non-financial risks. Due to limited size, ASEE Group companies do not have a separate Risk Management functions.

For main processes ASEE Group aims to apply 3 lines of defense:

- operational management of risks connected with the activities of the units
- risk management by designated roles or units e.g. Quality Manager or Compliance Officer
- activities of the unit responsible for internal audit - the Group Internal Audit Manager

Strategic risks are monitored and managed by the ASEE Group Management Board in cooperation with local Management Boards.

Operational risks (including financial and non-financial risks) are identified, measured and managed by the operational management of different functions under the supervision and directions by the ASEE Group or local Management Board. Risk responses and control mechanisms are designed by the responsible operational managers and approved by the ASEE Group or local Management Boards. Risk responses and controls are established and implemented through the policies, procedures and processes across ASEE Group.

G.3.2.

During the materiality analysis ASEE Group conducted risk assessment dedicated to social and environmental risks. Summary results of the said risk assessment are presented in the section 8.4 of this Report. They are also discussed in more detail in specific sections presented in the Report e.g. employee or environmental. It should be noted that some of the risks have been identified for the first time in 2020. Therefore, the Company

has not yet applied comprehensive risk mitigation tools in order to address and manage all identified risks. Nevertheless, risks are identified, risk mitigation tools are defined and activities will follow in 2021. The results of company's risk responses will be presented in the next non-financial report.

3.8. ETHICS MANAGEMENT

ASEE Group emphasises special importance to the ethics in its broadest meaning. The Code of Ethics implemented in May 2018 and Best Practice for GPW Listed Companies 2016 determine the main areas of the ASEE and Payten's special interest, what is reflected in internal policies and procedures. As the ethical conduct, the Code of Ethics recognizes compliance with social and legal standards as well as best practice worked out in a given industry sector.

Code of Ethics in particular concentrates on issues connected with equality and human rights, conflict of interests, protection of data privacy and intellectual property, fair competition and respect for the environment, as well as transparency of preparation of the Group financial data.

The Code of Ethics has been formally approved by the Management Board of the Company on May 14, 2018 and it applies to all companies forming ASEE Group. However, to assure its effectiveness, all local companies were obliged to undertake additional steps, if required under local legislation (what may be the case as ASEE Group consists companies from more than 20 countries, many of them not being member of EU).

Familiarization with content of internal policies, including Code of Ethics, is designed as a part of the onboarding process of new personnel of ASEE Group.

G.4.1.

ASEE Group approved Code of Ethics on May 18, 2018 and following documents supplementing its content:

- Conflict of Interests Policy approved on December 2, 2019
- Fair Competition Policy approved on May 18, 2018
- Anti-Corruption Policy initially approved on October 3, 2013 (and amended on December 15, 2014)
- and other Group and local procedures applied by given companies, departments to implement and detail provisions of the above policies.

G.4.5.

One potential breach of ethical standard was reported through internal reporting channels. Internal Audit conducted investigation regarding supposed unethical behavior and potential conflict of interest. Based on the conducted audit it was concluded that there was no unethical behavior or any conflict of interest. The investigation revealed some weaknesses in internal communication, limited trust and insufficient internal cooperation. ASEE Management Board undertook all necessary measures in order to impair identified weaknesses.

G.4.6.

Based on HR procedures, newcomers are acknowledged with ethical standards included in the local and Group policies. The need for ethical training was also discussed at the quarterly meetings of the senior managers in the last years (excluding 2020, as there were no face-to-face meetings, due to Covid-19). Thus, in 2020 year trainings were conducted only at local level and may have covered different percentage of employees in a given country (from 0% up to 100% in some companies) and may have been conducted in different way (from simple instructions and granting access to policies' text to conducting regular training). Considering the above, trainings connected with ethical issues were addressed to almost 1,000 persons.

ASEE Group is very active in field of mergers & acquisitions projects and faces issues connected with new entities on-boarding. The potential tool to be used to provide the same access and control over trainings' content is Human Capital Management (HCM) which is currently being implemented at the Group level and will be accessible for all employees from its individual accounts. The Company also considers formalizing the post-acquisition procedure to familiarize new companies in more efficient way with ASEE Group standards what also includes ethical related issues.



4. Key Non-Financial Performance Indicators

The Management Board of ASEE has defined a list of 35 non-financial indicators that are monitored and reported. For some of these indicators, ASEE Group has data for the whole of 2020. For other indicators, the collection of detailed data has started in 2020. In some cases ASEE Group also collected data for years before 2020. Procedures for monitoring of the necessary data will be refined in Q1 2021 after introduction of the new reporting standard.

From these indicators the Management Board selected 5 key performance indicators which are used in strategic and operational decision-making.

Key non-financial performance indicators:

G.2.2. List of certified management systems.

E.2.2. Percentage (%) of energy coming from renewable energy sources.

E.5.1. Weight of emitted greenhouse gases.

E.6.4. Waste emissions per revenues.

S.5.1. Average number of training days / hours per employee

Whilst we are confident these topics should be our non-financial priorities, the Company started to monitor some of data to measure these KPIs during 2020. Therefore our view of baseline performance is not always complete. In addition, due to global Covid-19 pandemic, we believe that this year was not representative to serve as a baseline.

Therefore we decided not to define measurable targets for our non-financial KPIs. We will keep these priorities in mind when defining our 2021 objectives. We commit to deliver actions aiming to improve our non-financial performance. We currently assume that we will be able to define measurable targets later in 2021 when the business is back to normal.



5. Environment

The environmental impact in the case of ASEE Group (including Payten) is fairly limited as there are no production operations. For the same reason changes in environment do not affect ASEE operations in short-mid term.

Payten companies that sell and service ATM & POS equipment may generate significant electrical waste when old equipment is disposed of by ASEE Group company or its client. ASEE Group offices also produce some municipal waste.

ASEE Group has not yet implemented a groupwide policy to manage its impact on environment for following reasons:

- the business operations of ASEE Group companies are very diverse, so introducing one policy for all companies might be complicated
- the regulations, especially in EU countries regularly change and significant change in regulation is expected in 2021, so such company-wide policy would have very short lifespan
- ASEE Group operates in EU, in European non-EU countries and in Latin America. Local regulations are different, so it would be difficult to include effectively all local requirements in groupwide policy. Therefore the priority was to comply with local regulations.

There is an expectation that following changes regulations and standard in 2021, the regulatory environment may be more stable. In 2021 ASEE Group aims to introduce a group wide environmental policy.

Whilst there has been no Group environmental policy, there are some more specific policies in place (e.g. for waste management) in some subsidiaries. Some companies implemented the environmental management system PN-EN ISO 14001:2005. Management takes due care to reduce the negative impact of the companies on the environment.

5.1. CLIMATE CHANGE

The planet's average surface temperature has risen about 1.18 degrees Celsius since the late 19th century, a change driven largely by increased carbon dioxide emissions into the atmosphere and other human activities.

The current warming trend is of particular significance because most of it is extremely likely to be the result of human activity since the mid-20th century and proceeding at a rate that is unprecedented over decades to millennia. <https://climate.nasa.gov/evidence/>

Climate change may impact the functioning of the ASEE Group in the following areas:

- Global climate warming may influence ASEE in long term, mainly due to potential impact on tourism.
- Extreme weather events may influence supply of purchased equipment and reduce ability to deliver on-site support services
- New climate related regulations may be introduced with new obligations on ASEE operations
- Electricity costs increase may influence ASEE cost of operations

Functioning of ASEE Group may impact climate change in the following areas:

- Long distance transport of purchased equipment
- Fuel consumption by company cars that service installed equipment
- The Group operates in many offices using energy and heating
- Business travel
- Waste management
- Scale of non-cash payment operations

Whilst ASEE impact on environment is limited, ASEE Group is committed to respond to global warming process by reducing GHG emissions. To confirm this commitment ASEE Group decided to manage down its GHG emissions as one of key non-financial performance indicators.

Actions aiming to reduce negative influence of ASEE Group operations on climate change are discussed in the following chapters below.

5.2. CONSUMPTION OF FUELS AND ENERGY

According to ASEE Group materiality study, energy and fuel consumption is one of the most important areas of company's environmental impact.

Total Energy consumption			%	
		Mg	MWh	
Car Fuel	Gasoline	133	1 639	16%
	Diesel	293	3 502	34%
Buildings	Energy		3 859	38%
	Heat		1 250	12%
Total Energy consumption			10 249	100%
Total Energy per revenue (MWh/1 million PLN)			9,98	
including Energy from Renewable energy sources			9,10	0,1%

E.2.1.

ASEE Group (including Payten) used 10 249 MWh of energy in 2020. We have evidence that 0,1% was generated by renewable energy sources. The remaining 99,9% is reported as 'non-renewable' although the Company will make more effort in 2021 to validate energy sources with suppliers of energy in our markets. ASEE Group will analyze options for obtaining energy from renewable sources.

Total energy use in MWh is divided equally between energy and heat used in offices and fuel used by company cars. In the Group's operating activities, energy is consumed primarily in offices, thus generating indirect impact. Therefore information collected from all operating companies contains data about both purchased electricity and heating consumption. It includes both rented and owned offices. As the company doesn't run production facilities, energy consumption is monitored as total energy use at the ASEE Group level.

Company uses many cars used, both as service vehicles and as means of employee transportation. The energy from the combustion of petrol and diesel fuel is related to the fleet of around 500 cars. Therefore fuel consumption results in significant direct environmental impact. During 2020 company cars made 8 188 069 kilometers with resulted in combustion of 541 549 liters of fuels. Whilst the company aims to reduce energy consumed, it may be a challenge to use 2020 as a baseline year. Due to Covid-19, mobility was certainly below normal annual average. As sustainability is increasingly important to ASEE Group, it plans to analyze how to decrease fuel consumption through different means including usage of electrical vehicles, hybrid cars or more environment friendly fuels.

E.2.2.

ASEE Group also monitors energy consumption from renewable energy sources. Only about 0,1% of energy consumed came from renewable energy sources. These were mainly hydropower stations in Bosnia. In-

ing the percentage of renewable energy sources is one of key ASEE Group priorities in the area of sustainability. The ASEE Group included it in its key non-financial performance indicators. Actions will be planned to increase this percentage in the following years.

E.2.3.

Energy consumption in relation to revenues is monitored. The ASEE Group used 9,1 MWh of energy per 1 million PLN revenue. The Capital Group has a long term aspiration to reduce this indicator. One of opportunities identified is further digitization of services offered.

ASEE Group operations do not offer opportunity to significantly influence downstream energy consumption.

5.3. GHG EMISSIONS INTO THE ATMOSPHERE

ASEE Board is increasingly concerned over climate change. ASEE Group aims to ensure its GHG reporting will be based on principles of: relevance, completeness, consistency, transparency and accuracy.

BUSINESS GOALS AND INVENTORY DESIGN

Weight of emitted greenhouse gases will be one of non-financial key performance indicators for ASEE Group. As additional metric ASEE decided to monitor greenhouse gases emissions per revenues.

As this is the first ASEE non-financial report, the focus in 2020 was to determine all relevant sources of GHG emissions and transparently explain reported data. In 2020 the company built good understanding of GHG emissions. Going forward ASEE will aim to:

- Continue to monitor GHG emissions risks
- Improve completeness of Scope 3 emissions data
- Identify cost effective reduction opportunities
- Prepare for 2021 mandatory reporting
- Set long term GHG reduction targets.

GHG emissions are monitored and reported according to The Greenhouse Gas Protocol Corporate Accounting and Reporting Standard – Revised Edition.

SETTING ORGANIZATIONAL BOUNDARIES

In setting organizational boundaries, ASEE GROUP decided to adopt Control Approach to consolidate GHG emissions. Complete list of subsidiaries included in ASEE Group report is presented in Appendix 1

SETTING OPERATIONAL BOUNDARIES

In order to set operational boundaries, the company analyzed data about the following potential sources of emissions:

- Energy and heating
- Car fuel
- Diesel used by generators
- Refrigerant used by air-conditioners
- Passenger travel
- Freight shipping
- Energy from renewable sources
- Waste

Following the analysis of data the company decided to include in the report GHG emissions from: direct emissions (Scope 1), indirect energy emissions (Scope 2) and some relevant upstream indirect emissions (Scope 3).

Scope 1: Direct GHG emissions from sources owned or controlled: emissions from the combustion of fuels in company owned/controlled cars and diesel used by generators. The company also considered refrigerant used by air-conditioners, but volumes reported appeared non relevant.

Scope 2: Electricity indirect GHG emissions: emissions from the generation of purchased electricity and heating that is consumed in its owned or controlled buildings. For ASEE Group companies, purchased electricity represents one of the largest sources of GHG emissions and the most significant opportunity to reduce these emissions.

Scope 3: Other indirect GHG emissions: in 2020 the Company focused on the most relevant sources of scope 3 emissions i.e. transportation and business travel.

ACCOUNTING FOR SCOPE 3 EMISSIONS

ASEE Group payments business line (Payten) has significant exposure to transportation emissions. Company buys ATMs and POS terminals, usually overseas. Shipping of this equipment generates significant GHG emissions. All ASEE Group companies' employees generate emissions resulting from business travel.

In 2021 ASEE Group will continue to analyze other potential Scope 3 emissions e.g. purchased goods and services, capital goods, waste, employee commuting, upstream leased assets (including outsourced services), end-of-Life treatment of sold products and downstream leased assets.

As the Group operates internationally no specific partners along the value chain were identified as the main GHG generators. Closer review of suppliers will be conducted in 2021.

When quantifying scope 3 emissions, ASEE Group identified significant differences between various companies. This is connected with various business models adopted. Whilst in some countries ASEE companies maintain ATMs using internal resources, in other countries maintenance is outsourced. ASEE Group plans a closer review of its outsourced services to determine possible changes in its Scope 3 reporting from 2021.

TRACKING EMISSIONS OVER TIME

Due to Covid-19, year 2020 is not a representative year to be a base year for target setting. Whilst ASEE Group is committed to monitor and decrease its GHG emissions, a base year must be a year when normal operations will continue throughout the whole year. Therefore year 2021 will probably not be used for goal setting either.

ACTIVITY DATA AND EMISSION FACTORS

Activity data were collected from all ASEE Group companies. In 2020 ASEE did not ask its suppliers to provide any data relating to specific activities in company's value chain. Therefore only industry average secondary data were used.

Published emission factors are used to calculate scope 1 emissions (in case of fuels) and scope 2 emissions (in case of electricity). Scope 2 emissions were calculated on the basis of location-based method. Scope 3 GHG emissions are calculated from activity data such as fuel use, car mileage, shipping distance or passenger miles and published emission factors.

EMISSIONS CALCULATION

Scope 1 and Scope 3 emissions were calculated with the use of GHG Protocol Tool in the format: “World Resources Institute (2015). GHG Protocol tool for mobile combustion. Version 2.6” available on the GHG Protocol Initiative website (www.ghgprotocol.org). Scope 2 emissions were calculated with the use of country level emission factors as recommended by International Energy Agency i.e. Production fuel mix factor (kgCO₂e per kWh) in: 2020_07_emissions_factors_sources_for_2020_electricity_v1_3.pdf (carbonfootprint.com)

All ASEE Group companies reported to the corporate center the following data: energy and heating, car mileage, diesel used by generators, passenger travel and freight shipping.

GHG Scope	Activity		Volume	Unit	MgCO ₂ e
Scope 1	Cars	Gasoline	2 190 351	km	520,14
		Diesel	5 782 473	km	1 617,84
		LPG	215 246	km	50,36
		EV (electric vehicles)	3 204	km	-
	Generators	Diesel (to produce energy)	315	litre	0,84
Scope 2	Buildings	Energy	3 858 641	kWh	1 952,29
		Heat	4 501 040	MJ	524,14
Scope 3	Travel	Air travel	183 090	passenger - km	17,76
		Rail travel	7 180	passenger - km	0,83
	Shipping	Ground/truck shipping	1 354 746 007	kg - km	275,59
		Air shipping	530 286 059	kg - km	325,19
		Rail shipping	12 870 644	kg - km	0,22
		Ocean/water shipping	8 059 020	kg - km	0,26
Total Scope 1 emissions					2 189,18
Total Scope 1 + 2 emissions					4 665,60
Total Scope 1 + 2 + 3 emissions					5 285,46
Total Scope 1 emissions per revenue (MgCO ₂ e / million PLN)					2,13
Total Scope 1 + 2 emissions per revenue (MgCO₂e / million PLN)					4,55
Total Scope 1 + 2 + 3 emissions per revenue (MgCO ₂ e / million PLN)					5,15

For Scope 1 (car fuel, diesel used by generators) and Scope 3 (passenger travel and freight shipping) ASEE Group applied centralized approach to calculate emissions in 2020 at the corporate level. For all transportation related emissions distance-based method was applied. Due to differences at country level energy emission factors the company adopted decentralized approach to Scope 2 emissions. In 2021 ASEE will consider decentralized approach also for scope 1 & 3, as it may increase climate risk awareness of all local companies.

Emission factor uncertainty for CO₂ emission factors in road transport have an uncertainty of 2-5 percent, due to uncertainty in the fuel composition. (based on 2006 IPCC Guidelines for National Greenhouse Gas Inventories, Volume 2 Energy, Chapter 3 Mobile Combustion published on:

https://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/2_Volume2/V2_3_Ch3_Mobile_Combustion.pdf

E.5.1.

Overall ASEE Group emitted 2 189,18 MgCO₂e of Scope 1 greenhouse gases to the atmosphere. Together with Scope 2, the Group’s emissions in 2020 were 4 665,60 MgCO₂e.

ASEE Group is aware that total Scope 3 emissions will have to be re-baselined as the company includes more Scope 3 emissions in the report. For that reason ASEE decided to use Scope 1 & 2 emissions for the purpose of defining main indicators used to monitor performance over time.

E.5.3.

ASEE Group's revenues are generated in many markets in various currencies. Therefore this measure will be very sensitive to possible changes of exchange rates. Initially ASEE Group decided to calculate GHG emissions per 1 million PLN revenue. The result in 2020 was 4,55 MgCO₂e/million PLN. As in case of total weight of GHG emissions, only Scope 1 and 2 is included in this metric. The company will continue to monitor exchange rates and also aims to add more Scope 3 emissions. For these reasons this KPI may be re-baselined in the future.

As GHG emissions per revenue are one of ASEE Group KPIs, the company consider many actions to reduce its emissions per revenue. Actions considered include e.g.

- investing in energy efficient technologies
- energy conservation.
- More environment friendly cars
- Less business travel more videoconferencing
- Less airplane shipping – better planning of supply
- More digital business
- Hybrid office – less office / less energy used / less employee commuting
- Switch to less GHG intensive sources of electricity.
- Install an efficient on site co-generation plant e.g. photovoltaic panels, particularly in countries where it replaces the purchase of more GHG intensive electricity from the grid or electricity supplier.

All environmental data collected are stored in a central repository. Source of information is documented, so any future material changes may be verified with people who provided information.

Other air emissions are not relevant in ASEE Group.

5.4. WASTE MANAGEMENT

E.6.1.

20	COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES	kg	115 696
20 01 35*	discarded electrical and electronic equipment containing <u>hazardous</u> components	kg	16 291
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 35	kg	97 497
20 01 33*	batteries and accumulators containing <u>hazardous</u> components	kg	75
20 01 34	batteries and accumulators other than those mentioned in 20 01 33	kg	1 833
15 01	packaging (including separately collected municipal packaging waste)	kg	9 131
20	municipal waste	kg	4 715
	TOTAL WASTE	kg	129 542
	waste containing hazardous components	kg	16 366
	waste NOT containing hazardous components	kg	113 176
	Waste emissions per revenues (kg / 1 million PLN)		126,20

Total weight of waste of ASEE Group (including Payten) exceeds 129 542 kg. 16 366 kg falls into hazardous waste category and 113 176 kg are non-hazardous. ASEE Group companies fully comply with all local waste management regulations.

In case of office based operations only municipal waste is generated. ASEE Group companies produced less than 5 tons of municipal waste in 2020. In addition packing resulted in more than 9 tons of waste. This waste is usually collected separately by professional companies responsible for waste management.

Majority of waste emitted by ASEE Group companies belongs to discarded electrical and electronic equipment. Out of more than 113 788 kg of such waste, 16 291 kg contain hazardous components. This equipment is mainly related to ASEE Group companies in cash and payments processing (ATMs and POS terminals).

ASEE companies which import electrical equipment comply with local regulations which impose obligations on any importer of electrical goods to be registered in 'waste management database'. ASEE Group companies are registered in such local waste management databases in: Bosnia, Croatia, Czechia, North Macedonia, Romania, Slovenia and Serbia. In addition in Kosovo, Montenegro and Spain ASEE Group companies cooperate with professional authorized local suppliers, who guarantee compliance with local regulations. Such waste is temporarily stored on ASEE premises in a way that prevents negative impact on the environment and health of employees.

E.6.2.

Waste emitted by ASEE Group companies is handled in a way which enables recycling by professional waste management companies. ASEE believes that some proportion of its waste is recycled. Until 2020 ASEE companies haven't tracked in detail management method of its waste. For that reason there is no detailed information available on breakdown of waste by management method for 2020. This indicator will be monitored closely from 2021.

E.6.4.

ASEE Group emitted 126,2 kg of waste per 1 million PLN revenues.

5.5. OTHER ENVIRONMENTAL ISSUES

The Company does not fail to comply with any environmental regulations and does not generate other material pollutions.

E.1. Direct and indirect impact: raw materials and consumables

As the Company does not process any production lines, the use of raw materials and consumables is not considered material.

E.3. Direct and indirect impact: water

ASEE Group uses only water for regular office use.

E.4. Direct and indirect impact: biodiversity

There are no biodiversity issues in ASEE Group operations.

E.6. Direct and indirect impact: waste and effluents

According to materiality analysis only waste generates relevant environmental impact. Effluents impact is negligible.

E.7. Other direct and indirect environmental impacts

ASEE Group did not cause any environmental pollution by its operating activities. There were no breaches of environmental regulations. No penalties were imposed on any ASEE Group company for breaching environmental protection laws.

E.8. Extended environmental responsibility: products and services

ASEE Group does not offer services with extended environmental responsibility.

5.6. SIGNIFICANT ENVIRONMENTAL RISKS

Risk of climate change: Global warming may result in reduced tourism traffic	
Threat	Opportunity
Reduced demand for traditional payment methods with cash (ATMs) and credit cards (POSS) may reduce company revenues	As a consequence of less tourism traffic people will spend more time at home, which results in increase e-commerce which opens opportunity to offer electronic payment channels
Risk of more restrictions on driving diesel cars in cities: More restrictive regulations may prevent ASEE from using its diesel car fleet to service clients in big cities	
Threat	Opportunity
Replacing car fleet with cars more advanced technologically may require significant investment thus negatively affecting company's profit	Upgrading car fleet to electric cars may both reduce GHG emissions and reduce car servicing and maintenance costs
The risk of a significant increase in electricity prices - Significant increase in electricity prices may result in a proportional increase in the Company's operating costs.	
Threat	Opportunity
Replacement of older more energy-intensive appliances used by ASEE Group with energy-efficient ones will require funding thus negatively affecting company's profit	Replacement of older more energy-intensive appliances used by ASEE Group with energy-efficient ones will reduce energy consumption and reduce GHG emissions
Risk of poor waste management: There is a risk of improper waste management, especially in case of electrical equipment which may be 'hazardous' waste	
Threat	Opportunity
Improper waste management may result in both environment pollution and financial penalties	The Company strictly applies legal requirements and cooperates with professional operators with appropriate permits for waste treatment.



6. Employee

The labor market has changed rapidly in recent years. More and more often, people taking up employment in a given organization pay attention not only to the financial condition of the company, but also to the rules, organizational culture, values and mission of the organization.

The personnel policy of ASEE consists of the following procedures:

- Recruitment and on-boarding policy
- Training policy
- Annual Performance Appraisal (APA)
- Performance Improvement
- Career Development
- Succession Planning
- Compensation policy
- Employee off-boarding process

6.1. EMPLOYMENT RATE AND REMUNERATION LEVELS

S.2.1.

As at December 31, 2020, ASEE (including Payten) employed 2,799 people (full-time equivalent).

gender	gender split (HC)	gender split (%)
female	1049	37.48%
Male	1750	62.52%

The employment structure of ASEE by gender was dominated by men, of whom 1,750 at the end of 2020, which constituted 62.52% of all employees. Among all the employed, 610 people were employed under fixed-term employment contracts, of which 328 were women and 282 men, and 2,189 people were employed under permanent contracts, of which 721 were women and 1,468 men.

Contract type	Age bracket & gender	Number of employees
Definite		610
	Female	328
	≤ 30	129
	30-40	121
	40-50	62
	>50	16
	Male	282
	≤ 30	120
	30-40	102

	40-50	45
	>50	15
Indefinite		2189
	Female	721
	≤ 30	166
	30-40	248
	40-50	219
	>50	88
	Male	1468
	≤ 30	326
	30-40	544
	40-50	444
	>50	154
	Grand Total	2799

S.2.2.

In 2020, a total of 566 employees were employed, of which 239 were women and 327 men. The age structure of the employed employees was as follows:

Age bracket & gender	Number of employees
Female	239
≤ 30	102
30-40	74
40-50	52
>50	11
Male	327
≤ 30	152

30-40	93
40-50	60
>50	22
Grand Total	566

S.2.3.

The number of people who left the organization in 2020 amounted to a total of 663, of which 356 were people who ended their cooperation with ASEE on their own initiative (voluntary leavers). No data about age and gender of leaver has been monitored to date. The company will monitor it from 2021.

Recruitment and equal opportunities

ASEE aims to select and appoint the best people for the job and develop them to perform to the highest professional standards. The following principles should be adhered to at all times:

- ASEE seeks to recruit the best candidate for the job based on merit.
- The recruitment and selection process should ensure the identification of the person best suited to the job and ASEE.

ASEE treats all candidates fairly with respect and courtesy, aiming to ensure that the candidate experience is positive, irrespective of the outcome. ASEE ensures that the recruitment and selection of staff is conducted in a professional, timely and cost-effective manner, in compliance with current employment legislation. ASEE has a principle of open competition in its approach to recruitment. In order to keep clear and professional selection standards, internal candidates also need to undergo the selection process for a given post.

ASEE promotes best practice in recruitment and selection. It will continuously develop its recruitment and selection practices to allow new ideas and approaches to be incorporated. It is very important for the good image of ASEE, to keep contact with the candidates, inform them about their applications, whether they have been accepted for the next stage of the recruitment processes or rejected.

Remuneration system

S.2.9.

In order to ensure fair working conditions and ensure a competitive position on the market, ASEE offers its employees market salaries, in line with the employee's competences and experience. When taking men to woman ratios one has to keep in mind that IT faculties are still completed mostly by men making it more difficult to attract amount of women we want. Currently 37% of total employee population are women.

Remuneration offered varies in countries where ASEE Group operates. ASEE companies employment structure also significantly varies among ASEE companies. Therefore the ratio of the average gross salary of women to the average gross salary of men in individual categories is monitored at the local company level. It appears more relevant than monitoring the ratio at the entire ASEE Group level. The table below illustrates the range among ASEE Group companies i.e. the lowest and the highest ratio of women to men salaries. In the future ASEE Group will consider monitoring this ratio also at the entire ASEE Group level.

Executives	Managers	Employees
68%-221%	74%-100%	75%-100%

S.2.10.

The ratio of average remuneration of the management board members to the lowest salary paid by the company (converted into FTE) amounts 8268%

S.2.15.

As a part of salaries package ASEE offers non-salary benefits such as: life insurance, medical packages, , sports cards, travel allowance.

6.2. EMPLOYEE DEVELOPMENT AND EDUCATION

ASEE believes that people are its most valuable resource, and as an organization, we must invest in our workforce in order to develop and maintain excellent standard of service that our customers expect.

Training and development Policy applies to all ASEE full or part time Employees. It refers to internal and external professional training and development programs, conferences, seminars and any other learning events that will be directly related to Employee's role and will require ASEE's financial contribution.

Main initiatives in the field of training and development are concerned with acquiring and improving technical knowledge for software developers and engineers, plus soft skills trainings for top management (leadership effectiveness) and for all employees to address specific skills shortages. Main areas that employees were trained in- technical skills, sales trainings, soft skills trainings, leadership trainings, basic management skills, finance management, software tools training, on the job training, onboarding for new employees.

S.5.1.

We believe, that ASEE's strength is directly related to the skills, competencies and talents of its Employees. ASEE is committed to the continuous development of its Employees through a planned and structured approach to learning, as the environment we work in and our customers' expectations are constantly changing. Therefore, ASEE focuses its attention on development activities that add value to the business, enabling the Group to meet strategic objectives. We support employee development by offering numerous trainings:

Number of training courses and employees trained in 2020:

	Quantity
Training courses	419
Employees trained	921

Estimated number of training hours per employee in 2020 amounted 10131. The average number of training hours per employee is estimated at 3,62.

Company covers all expenses related directly to the training (cost of trainings) but doesn't offer special privileges to the employees raising their professional qualifications such as training leave.

6.3. HEALTH AND SAFETY

At ASEE, occupational health and safety issues are treated with the highest priority. With the outbreak of the COVID-19 virus epidemic at the beginning of 2020, the Group has taken a number of measures to ensure safety, including remote work, the need to wear masks for people who must be present in the office, keeping a distance of at least 1.5 meters. All adverse effects are monitored and reported on a weekly basis as part of the crisis team of which ASEE is a member.

6.4. HUMAN RIGHTS

ASEE Group formally implemented Code of Ethics in May 2018 applicable to all companies forming the Group. The Code defines Equality as important value for the Group meant as respecting the human rights and labor law standards. In particular providing fair working conditions to employees and being equally treated irrespective of race, gender, religion or political beliefs is of the main concern of the ASEE Group.

The Code of Ethics also underlines that equality should refer to fair remuneration, professional development and promotion of employees. The above is supported by other internal procedures referring to employees and their workplace as required by local labor legislations. Additionally, internal HR group policy on selection and recruitment confirms equal treatment of candidates as the principle of the process.

The group policies provisions may be supplemented by local code of conduct addressing issues connected with human rights and other ethics related problems (Romania, Necomplus).

Bearing in mind the character of business activity of ASEE Group the risk connected with human rights breaches is at minimal level. Significant part of the IT “products” produced by the Group are originated in companies as the effect of the intellectual work of the employees. Thus, risks connected with territories being recognized as problematic in view of child work, lack of equality or not-respecting employees’ rights is excluded in the major extent.

Companies of ASEE Group as IT and payment sector services providers are also resellers of hardware manufactured by third parties. However, major hardware being delivered by ASEE Group are POS terminals or ATMs of which manufacturers are well recognized on the market. ASEE Group co-operates with the biggest players (Diebold Nixdorf, Ingenico) which have established their own complex compliance system which must be observed by their partners, including ASEE Group (e.g. confirmed by the group contract concluded with Diebold Nixdorf in November 2017).

6.5. OTHER EMPLOYEE ISSUES

S.3. Employee relations and freedom of association – no issues relating to employee relations were observed, therefore the area was not considered material for the ASEE Group.

S.6. Diversity management – as there were no cases of discrimination, harassment, sexual harassment reported to date, the area is not considered material

S.8. Child and forced labor – as ASEE operates mainly in European markets with strict labor regulations, there were no reported cases of child or forced labor.

6.6. SIGNIFICANT RISKS RELATED TO EMPLOYEE ISSUES

Risk description	Risk mitigation action
The risk of lack of employees related to the possibility of recruiting suitably qualified employees on the labor market	ASEE closely monitors the labor market. Scheduled recruitment processes are carried out in advance. We undertake employer branding activities aimed at building the employer's position on the labor market
Risk of losing key staff	We conduct an annual employee satisfaction survey and develop repair plans in areas indicated by employees as requiring improvement and optimization, we create an annual analysis of succession plans for key positions

<p>Risk of insufficient team competences</p>	<p>Every year, training courses are organized to raise the qualifications and competences of employees</p> <p>Employee remuneration includes a variable part depending on the levels of achievement of goals, and a benefit package</p>
<p>Risk of wage pressure</p>	<p>ASEE closely monitors the labor market, including the wage trends that are taking shape there. We care about the competitiveness of salaries in the company; we conduct open communication regarding development opportunities as part of internal recruitment.</p>
<p>The risk of lack of employees as a result of COVID-19 infection</p>	<p>The company has taken a number of measures to ensure safety, including remote work, the need to wear masks for people who must be present in the office, keeping a distance of at least 1.5 meters. All adverse effects are monitored and reported on a weekly basis as part of the crisis team of which ASEE is a member.</p>



7. Society

7.1. PUBLIC AID AND PUBLIC SECTOR CONTRACTS

S.1.1.

Total value of public aid was about 3 004 thousand PLN. Subsidies / grants were mainly applied in Croatia, Serbia and Slovenia. Decrease of taxes took place mainly in Serbia. Majority of loans / credits is attributable to Portugal

Public Aid	kPLN
Subsidy, aids, grants to salaries or other remuneration costs	1 155
General COVID-19 related aid, for no particular costs	87
Decrease of taxes or social security costs, tax reliefs	797
Loans, credits or credit lines.	899
Other	66
Total aid received	3 004

In addition in Spain, due to COVID-19 some employees temporarily were not working. In this period their salaries were paid from public funds. The value of this support was 70 kEUR.

S.1.2.

Revenues coming from public sector were about 77 143 thousand PLN. The main source of public sector revenues were central and local governments. Overall revenues coming from public sector accounted for about 7% of ASEE Group revenues. Such range is in line with management expectations.

Public Sector Contracts	kPLN
Central and local governments	61 590
Social Security	378
Uniformed Services	6 432
Other Public Administration Entities	8 743
Total sales revenue from public sector	77 143

7. 2. LOCAL COMMUNITIES AND COMMUNITY INVOLVEMENT

ASEE believes that an integral part of the organization's strategy should also be responsibility for the impact of its decisions and actions on society and the environment through transparent and ethical behavior. The company promotes and supports CSR activities and encourages employees to get involved in social initiatives. In 2020, despite the difficult situation and limitations related to COVID-19, employees took part in numerous CSR initiatives, including:

Walk and Run for BELhospice

We wanted to find a way to be helpful to those in need and to stay physically active and healthy, so we have found an opportunity to be good both to ourselves and to others.

For years, ASEE, Payten and Chip Card in Serbia have supported BELhospice in its efforts to provide patients with palliative care. By participating in this year's activity in which our employees took part by walking and running, our company made a donation and all the funds raised will be invested in what is necessary for transporting patients to a medical facility and providing assistance to the patients isolated in homes.

70 colleagues walked over 10.000 km together. Basically, we walked to New York and are now heading back. 😊. We will continue spreading the spirit of togetherness, humanitarianism and readiness to help by investing our joint efforts.

One Cap for a Smile

Over the years ASEE employees in Serbia have participated in collecting plastic bottle caps with a goal to ensure support for children. Each humane act "From a Bottle Cap to a Smile" confirms that every delivered orthopaedic aid means that we have contributed a little!

Our small efforts mean a lot to someone, so we continue contributing as a team, aiming to bring one more smile if possible. The world needs more smiles.

Together against COVID-19

In order to help the country in dealing with the crisis caused by the COVID-19 virus, ASEE in Macedonia has successfully implemented its product "Live" in the contact center of the Government of the Republic of Northern Macedonia.

The Government Contact Center is intended to support businesses and citizens in relation to economic issues while handling the crisis caused by COVID-19.

Making a PAWsitive Impact

ASEE in Macedonia participated in Mavrovo Humanitarian Giant Slalom and this year's cause was to help those that do not have any opportunity to afford daily meals and warm clothes on these cold days. The donation of this year's humanitarian act is intended for the "PAWsitive Impact" movement.

Supporting Education

ASEE in Turkey joins a Charity Run every year in October for the last five years to support non-governmental organizations within our CSR activities. In 2020, we needed to change our plans like the rest of the world because of Covid-19 but we didn't forget those who need our support.

This year we took the opportunity to celebrate our national holiday by making a donation to the "Association for Supporting Contemporary Life" to provide two scholarships: for one university and one primary school student.

7.3. FIGHTING CORRUPTION

The Anti-Corruption Policy was approved formally by the Company's Management Board on October 3, 2013 (subsequently amended on December 15, 2014). The Policy applies to all companies forming ASEE Group (including Payten) and includes wide definition of employees (including consultants, contractors, agents).

Bribery and corruption is broadly defined and includes also unpermitted gifts and hospitality. The permitted gifts and hospitality must meet number of requirements connected, in particular, with value, purpose and

prior approval of authorized person. Any cash (or its voucher equivalents) are prohibited. In case of public officials, politicians, the requirements are even more strict than in case of any other third parties.

The written records of the gifts/hospitality offered or accepted by an employee should be submitted to the head of finance of a given local entity who maintains register of the records of all hospitality or gifts. Local head of finance should quarterly provide Group CFO with table of the gifts and hospitalities. Local trainings are mandatory every year and should be included in the on-boarding process of newcomers. In recent years the Company conducted training considering the Policy for local heads of finance and senior managers. In 2020 the trainings were conducted only locally and had different format: from granting access to content of the Policy with instruction “read-and-follow” to regular training (approximately 1,000 persons).

The above is also supplemented by the Conflict of Interests Policy approved by the Company’s Management Board on December 2, 2019. The Policy requires from all employees of the local companies to declare information on potential conflict of interests. In case of local directors this issue is also addressed in the companies’ articles of association and contracts for performance of the duties in management boards.

The Fair Competition Policy (approved in 2018) includes provisions to counteract activities that might be recognized as contradictory to fair competition, what also includes dishonest arrangements with other entities being actual or potential competitors in bids announced by potential clients (including public bodies and state owned enterprises).

S.10.1.

The Company recognizes as potential business areas exposed to the risk of corruption:

- sector of the public procurement, as local companies often provides services to public bodies or state owned companies;
- any other relations in which related parties to employees (in particular local directors) may be involved, due to small populations of some countries in which ASEE Group operates, what may often result in necessity to enter into relations that may be recognized as potential conflict of interests in its broadest meaning;

Considering the above, the ASEE Group pays its particular attention to control activities, contractual relations, expenditures in view of risks connected with conflict of interests of its employees. Supply chain is not recognized as a significant area for risk of corruption as the potential supply of the items with substantial value refers either to:

- third parties software solutions re-sold to clients which are individually agreed with clients or even explicitly required by end-clients; or
- ATMs and POS terminals which are manufactured by a limited number of entities; ASEE Group cooperates with the biggest players as e.g. Diebold Nixdorf, having its own strict anti-corruption program.

S.10.2.

There were no reported cases of suspected corruption

S.10.3.

There were no reported cases of confirmed corruption

7.4. PRODUCT AND CONSUMER SAFETY

ASEE Group places great emphasis on product and consumer safety considering nature of the provided services:

- dedicated software solutions for financial, industry, public administration telecommunication and utility sectors (development of IT infrastructure, implementations and support, ensuring continuity of business processes, automation of operations, and customized software development),
- payment industry solutions, (services under Payten brand for non-financial and financial institutions connected with eCommerce, mPayments, Card Processing, ATM and POS related services).

ASEE Group provides services on the B2B market and its services may have impact on consumers being end-clients. As the Group operates on a competitive market connected, with broadly defined financial industry, it needs to fulfil high-level international standards regarding information security, personal data security, IT security, quality management and safety standards connected with payment services and banking services (including the ones established by local legislation and national banks). Internal regulations, as Code of Ethics approved in May 2018, also underline special importance of compliance with social and legal standards as well as best practice worked out in a given industry sector.

As ASEE Group is not a manufacturer of material goods, it shall be noticed that there is a marginal risk of consumer losses with respect of comfort and safety use of both the products and pollution of natural environment. Nevertheless, as a re-seller of hardware and POS/ATMs, the Group co-operates only with the reputable, key manufacturers having their own strict product and consumer safety policies. Thus, use of the supply chain has a marginal impact on risk connected with life and health of consumers.

In order to provide product and consumer safety, understood as protection of consumer's interests with particular attention to safety of data and safety of financial interests, ASEE Group members have implemented a number of internal systems adjusted to the scope of activity of the particular entity. List of certificates is included in Appendix 2.

All standards are compliant with the norms issued from the national banks and commercial banks to which are provided services by the ASEE Group members.

7.5. MARKETING COMMUNICATION

The ASEE Group offers its services to business customers, winning the majority of clients in tender procedures. For this reason, the scope of the Group's marketing activities is quite limited.

The company does not have its own code of ethics in marketing communication, however, it adheres to the basic principles of ethics in matters of responsible marketing communication. The undertaken marketing activities do not contain discriminatory content, in particular due to race, religious beliefs, sex or nationality.

ASEE Group does not conduct sponsorship activities at the central level. Local sponsorship activities are primarily aimed at supporting local communities.

S.12.2

In 2020, there were no cases of non-compliance with regulations and voluntary codes concerning marketing communication in the ASEE Group.

S.12.3

Therefore, there were no administrative proceedings against the Group or any of the subsidiaries* for this reason. As a consequence, no financial penalties have been imposed on the Group or any subsidiary for violation of laws or regulations in relation to the integrity and ethics of marketing communication*.

*) Applies to: Albania, Bosnia, Bulgaria, Croatia, Kosovo, Macedonia, Montenegro, Spain, Poland, Romania, Serbia, Slovenia, Czechia, Turkey

7.6. PRIVACY PROTECTION

In 2018, following entry into force of GDPR (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC or any subsequent legal provision that may amend or replace such Regulation), the Company adjusted internal policy on security dated 2014 to new GDPR requirements.

Considering the fact that part of the companies forming ASEE Group are registered outside EU, the Company's Management Board instructed local managements to adjust the applied technical and organizational measures to standards not only required on the basis of local legislation but also to GDPR. The process of the implementation of GDPR standards in local companies was subsequently reviewed by internal group auditor in 2019.

Notwithstanding the fact that the companies of the Group provide services within B2B sector, they may have access to personal data of individuals being end-clients of the serviced entities. The above is strictly connected with the fact that main recipients of the Group's services are financial institutions (banks). However, similar situation might also occur in Payten companies providing payment related services to merchants (e.g. ECR companies).

The internal procedures protect not only personal data but also any type of the clients' data also by requiring signing confidentiality statements by employees and contractors.

Due to nature of the services, in particular the ones provided to banks, the companies of the Group maintains number of ISO certificates, including the ones considering the security of information.

ASEE Serbia is certified to ISO/IEC 27701:2019 Security techniques — Extension to ISO/IEC 27001 and ISO/IEC 27002 for privacy information management. Others are certified to earlier versions of ISO/IEC 27001 - Information Security Management System (ASEE's subsidiaries in Romania, Croatia, Macedonia and Bulgaria). List of main certificates of the ASEE Group is available under: <https://see.asseco.com/about/norms-certificates> (except for certificates containing sensitive or confidential information)

S.13.1

No incidents reported linked of clients'/employees' personal data leakage or unauthorised use.

S.13.2.

No administrative proceedings against the company initiated with regards to personal data protection.

S.13.3.

No financial penalties for breaching laws and regulations on personal data protection imposed on the Company.

7.7. OTHER SOCIAL ISSUES AND MARKET-RELATED ISSUES

S.14. Product labelling – as ASEE Group does not offer physical product, the area is immaterial.

S.15. Company maintains long term relationships with its suppliers. Therefore it seeks to establish balanced relationships with suppliers. ASEE aims to diligently pay its liabilities to contractors. The relationships are so stable that the company does not consider tracking of rotation of liabilities / receivables material for social perspective.

There have been no administrative proceedings against the company for anti-competitive and anti-market behaviors.

7.8. SIGNIFICANT RISKS RELATED TO SOCIAL AND ANTI-CORRUPTION ISSUE

Risk description	Risk mitigation action
Lack of equal awareness of the anti-corruption procedures and differences in approach to their implementation in day-to-day practice between local companies.	<p>Looking for improvement of the training tools what includes implementation in 2021 of the Group Human Capital Management system which consists also of training module accessible from individual employee's account.</p> <p>Internal audits. Registers of hospitality or gifts.</p> <p>Future formalization on-boarding process of new entities joining the Group what includes also their adjustment to the Group compliance standards.</p>
Incidents connected with potential breach of safety of consumers and services what includes also safety of data, personal data.	<p>Conducting renewals of the certifications including ISO.</p> <p>Internal audits.</p>



8. About the Report

Statement of the Asseco South Eastern Europe S.A. Group on non-financial information for 2020

This report, drawn up in accordance with Non-Financial Information Standard (SIN), includes non-financial information concerning the Asseco South Eastern Europe S.A. (ASEE) Group for the period from 1.1.2020 to 31.12.2020 and is an integral part of the ASEE Group's activity report.

ASEE Group decided not to benefit from a statutory exemption resulting from including its non-financial information in the statements of the Asseco Poland Capital Group on non-financial information, in conjunction with art. 49b section 11 of the Accounting Act.

This statement is the first report of the non-financial information published by the Group.

8.1. RELEVANCE OF INFORMATION IN THE REPORT

Report specification

Date drawn up: 03.02.2021.

Scope of the report: consolidated statement on non-financial information of ASEE Group.

Report standard: report prepared in accordance with the Non-financial Information Standard (SIN)

Report verification: Report was not externally verified

8.2. RELEVANT STAKEHOLDERS

In preparation for the report, the materiality study was conducted, which aimed to determine which internal and external stakeholder groups are relevant in the case of the Group and in which non-financial areas the Group influences the environment and what areas of the environment influence the Group.

The materiality study was carried out in Q4 2020. It consisted of:

- analysis of the value chain process, including analysis of operational processes group and supply chain
- a regulatory analysis covering law, good practices and other industry-related guidelines;
- interviews with selected managers;
- a comparative analysis of the information collected internally with the recommendations contained in SIN Annex 2, focused on reviewing and validating the discrepancies between ASEE internal view and SIN Annex 2 recommendation.

Following the study identified 6 relevant stakeholder groups

- End users of services
- Employees
- Customers
- Suppliers
- Shareholders
- Local community

8.3. MATERIAL NON-FINANCIAL ISSUES

The materiality study was conducted in the fourth quarter of 2020. It consisted of:

- value chain process analysis, including analysis of a group of operational processes and supply chain
- Regulatory analysis covering law, good practice and other industry guidance;

The materiality analysis was concluded with selection of 13 important non-financial issues:

G.1. Business model and strategy

- G.2. Corporate governance
- G.3. Social and environmental risk management
- G.4. Ethics management
- E.2. Direct and indirect impact: fuel and energy
- E.5. Direct and indirect impact: air emissions
- E.6. Direct and indirect impact: waste and effluents
- S.1. Public aid and public sector contracts
- S.2. Employment rate and remuneration levels
- S.5. Employee development and education
- S.10. Fighting corruption
- S.12. Marketing communication
- S.13. Privacy protection

The ASEE Group has decided that for the purpose of non-financial reporting materiality study will be repeated in 2021 after introduction of new SFDR regulations which will result in changes in reporting standard. Following that, materiality analysis will be updated every 3 years, unless before the end of the next cycle new relevant factors will appear, which will require additional review.

8.4. MATERIAL NON-FINANCIAL RISKS

Non-financial Reporting Segment	Inherent Risk Description
Business model and corporate governance	
III.1. The market and strategic development directions	Strategic risk - risks related with general economic indicators (projected GDP growth, inflation rate etc.), alternative business models, competitors, suppliers, new disruptive technologies, shift of customers' needs, etc. that could have adverse effect on the Group strategy and growth
III.2. Business model	Risk - competitors to develop new, alternative and disruptive business model and technologies.
III.3. Supply chain	Key suppliers failed to deliver agreed quality and quantity of goods or services
III.4. Capital Group	Risk - Lack of capital support from shareholders or through generated profit in order to support the business growth, new markets, new acquisitions or new revenue stream of products and services

III.5./III.6 Management structure/systems	Inappropriate organizational structure could lead to operations inefficiencies, weak decision making process, lack of cooperation, increased operational expenses and slow down of revenues.
III.8. Ethics	Risk are addressed in other segments employment issues, health and safety, anti-corruption, HR etc.
V. Environmental issues	
V.1. Climate change	N/A as individual risk segment. General and it is related with below presented environmental risks.
V.2. Consumption of fuels and energy	V.2.1. Risk of significant increase of electricity prices and electricity consumption that may lead to increase of operational expenses
	V.2.2. Risk of significant increase of fuel prices and fuel consumption that may lead to increase of operational expenses
V.3. Air emissions	Risk of increased CO2 emissions and not fulfilled set KPIs/objectives due to increased air travel and companies operations related with fuel and/or electricity consumption
V.4. Waste	Risk of Poor Waste Management of municipal waste and electrical/electronic equipment that could lead to potential penalties.
VI. Employee issues	
VI.1. Level of employment and wages	VI1.1. Loss of Key Personnel and Competences - Not competitive wages, benefits and working conditions
	VI.1.2. Risk of increased employees expenses due to significant market increase of salaries that could lead to decrease of operational margin and profit.
	VI.1.3. High employees' turnover rates due to uncertainty, employees dissatisfaction and unequal treatment
VI.2. Employee development and education	Lack of investment in employees' necessary knowledge and skills that could have negative impact on effectiveness and efficiency in operations, lack of quality outputs and deliverables, as well as reduced business growth and financial results.
VI.3. Occupational health and safety	Not providing suitable working conditions in accordance with the Safe and Health regulatory requirements
VI.4. Human rights	Cooperation with suppliers and clients that fail to respect basic human rights and using child labor may lead to materialization of reputational and compliance risk.

VII. Social and corruption issues	
VII.1. Use of public aid and public orders	VII.1.1. Not fulfilling contractual terms and conditions and set standards in public sector projects.
	VII.1.2. Use of public subsidies/economic support and benefits not in accordance with the required beneficial terms and conditions.
VII.2. Local communities and social involvement	Risk of negative public perception of limited social activities, sponsorships and donations.
VII.3. Anti-corruption	Risk of malpractice and misconduct. Risk of offering and receiving bribes, gifts and hospitalities could lead to potential regulatory sanctions and damaged reputation.
VII.4. Consumer safety	N/A as individual risk segment in ASEE products and services.
VII.5. Marketing communication	Irresponsible marketing communication could lead to damaged reputation, loss of clients and to negatively affect financial results of the company.
VII.6. Privacy Protection	Risk of failure to provide personal data protection and security (data leakage and/or unauthorized data use) may lead to potential regulatory sanctions and penalties, as well as loss of reputation and client trust.



9. Tables of Compliance

9.1. TABLE OF COMPLIANCE WITH THE REQUIREMENTS OF THE ACCOUNTING ACT

Requirement of the Accounting Act	Chapter
A concise description of the business model (art. 49b ust. 2 pkt 1)	3.2.
Key non-financial performance indicators (art. 49b ust. 2 pkt 2)	4
Policies in non-financial areas and their results (art. 49b ust. 2 pkt 3):	
- policies with respect to environmental issues	5
- policies with respect to social issues	7.4.; 7.5.; 7.6.
- policies with respect to the issues related to respecting human rights	6.4.
- policies with respect to anti-corruption and anti-bribery actions	7.3.
- policies with respect to employment issues	6
Due diligence procedures (art. 49b ust. 2 pkt 4)	3.5.; 3.6.; 3.7.; 3.8.
Major non-financial risks and management of such risks (art. 49b ust. 2 pkt 5)	3.7.; 5.6.; 6.6.; 7.8.; 8.4.

9.2. SIN COMPLIANCE CHART

Indicator	Description	Page	Comment
G.1.1.	Description of the company's growth strategy including social and environmental aspects.	9	
G.1.2.	Characteristics of the applied business model.	10	
G.2.1.	Description of the management structure.	11	
G.2.2.	List of certified management systems.	14	
G.2.3.	Description of the internal control system.	14	
G.3.1.	Description of the company's approach towards risk management.	15	
G.3.2.	List and short characteristics of the identified social or environmental risks.	15	
G.4.1.	Indicate if the company has a formal Code of Ethics.	16	
G.4.5.	Number of reported potential breaches of the ethical standards.	16	
G.4.6.	Number of ethical training sessions, number of participants.	16	
E.2.1.	Total energy use in MWh presented according to the main sources of energy.	22	MWh used instead of GJ
E.2.2.	Percentage (%) of energy coming from renewable energy sources	22	
E.2.3.	Energy use per unit of product or revenues.	23	

E.5.1.	Weight of emitted greenhouse gases.	25	
E.5.3.	Greenhouse gases emissions per unit of product or revenues.	26	
E.6.1.	Total weight of waste divided into hazardous and other than hazardous.	26	
E.6.2.	Total weight of waste by management method.	27	
E.6.4.	Waste emissions per unit of product or revenues.	27	
S.1.1.	Value of state public aid (financial support and equivalents of subsidies).	37	
S.1.2.	Value of revenues coming from public sector contracts and their share in total revenues.	37	
S.2.1.	Number of employees converted into full time equivalents by type of employment contract.	30	
S.2.2.	Number of employees hired in the reporting period, converted into full time equivalents.	31	
S.2.3.	Number of employees leaving the company in the reporting period, converted into full time equivalents.	32	
S.2.9.	Ratio of average gross salary of women to average gross salary of men in particular employee groups.	32	Monitored at individual company level
S.2.10.	Ratio of average remuneration of the management board members to the lowest salary paid by the company.	33	
S.2.15.	Information on non-salary benefits offered to employees.	33	
S.5.1.	Average number of training hours (or training days) per employee.	33	Estimated
S.10.1.	Business areas exposed to the risk of corruption.	39	
S.10.2.	Number of reported cases of suspected corruption.	39	
S.10.3.	Number of confirmed cases of corruption.	39	
S.12.2.	Administrative proceedings against the company.	40	
S.12.3.	Financial value of penalties for breaching laws and regulations on reliability and ethics in marketing communication.	41	
S.13.1.	Number of incidents linked of clients'/employees' personal data leakage or unauthorized use.	41	
S.13.2.	Administrative proceedings against the company.	41	
S.13.3.	Financial value of penalties for breaching laws and regulations on personal data protection.	41	

10. Appendices

10.1. APPENDIX 1 – LIST OF COMPANIES

Asseco SEE Sh.p.k - Albania
Asseco SEE doo BiH
Payten doo BiH
ASEE Bulgaria
ASSECO SEE d.o.o. Croatia
GASTROBIT-GRC GRUPA D.O.O. Croatia
Integrirani poslovni sustavi d.o.o. Croatia
MONRI PAYMENTS d.o.o. Croatia
PAYTEN d.o.o. Croatia
Sonet Czechia
Asseco SEE Sh.p.k - Kosovo
Asseco SEE Macedonia
Payten Macedonia
Payten, bServices and emon Montenegro
NECOMPLUS, S.L. Spain
NECOMPLUS COLOMBIA SAS
NECOMPLUS SERVEIS ANDORRA
NECOMPLUS PERU SAC
NECOMPLUS PORTUGAL
NECOMPLUS DOMINICANA
Asseco South Eastern Europe S.A. - POLAND Warsaw
ASSECO SEE SRL (ROMANIA)
PAYTEN PAYMENT SOLUTIONS SRL Romania
Payten d.o.o. Slovenia
ASEE Serbia
Chip Card Serbia
Payten Serbia
Asseco SEE Bilişim Teknolojileri A.Ş.
Mobven Teknoloji A.Ş. Turkey
Payten Teknoloji A.Ş. Turkey

10.2. APPENDIX 2 – LIST OF MANAGEMENT SYSTEM CERTIFICATES AND ATTESTATIONS

At least 1 ASEE Group company implemented systems based on the following certificates:

- ISO/IEC 27001 - Information Security Management System - an international standard concerning the requirements for the creation, maintenance and development of information security management systems, containing a set of best practices regarding the methods of security management and guaranteeing clients the protection of their data;
- ISO/IEC 27701 - Privacy Information Management System and ISO/IEC 27002 - Information technology - Security techniques - Code of practice for information security controls - extensions for privacy of ISO/IEC 27001 containing requirements for the establishment, implementation, maintenance and continuous improvement of the Privacy Information Management System;

- ISO/IEC 20000-1 - Information Technology – Service Management - an international standard for IT service management, containing requirements for establishing, implementing, maintaining and improving a service management system (SMS);
- ISO 14001 - Environmental Management System - an international standard which specifies the requirements for an environmental management system that can be used to enhance company's environmental performance which task is to support environmental protection and prevent pollution in a manner that takes into account socio-economic needs;
- ISO 22301 - Business Continuity Management System – an international standard containing a framework for the identification of key risk factors affecting the organization and for maintaining its operations in the most difficult conditions;
- ISO 9001 - Quality Management System – an international standard that specifies the requirements to be met by an organization's quality management system which helps ensuring that customers get consistent, good-quality products and services, which in turn brings business benefits.

Due to the fact that some of main branches of activity of ASEE Group is end-to-end payment industry solutions for financial and non-financial institutions and banking services, whenever type of activity of any of ASEE Group members' requires that, following standards are observed:

- PCI DSS - Payment Card Industry Data Security Standard - a security standard developed by the PCI SSC (PCI Security Standards Council) for payment card merchants and processors and is based on five global payment brands - American Express, Discover Financial Services, JCB International, MasterCard Worldwide, and Visa Inc., who have agreed to include PCI DSS as a technical requirement for compliance with each of their data security programs;
- PCI PIN - Payment Card Industry PIN Security Requirements and Test Procedures - a security standard developed by the PCI (Payment Card Industry) Security Standards Council comprising a complete set of requirements and testing procedures for the secure management, processing, and transmission of personal identification number (PIN) data during online and offline payment card transaction processing at ATMs and attended and unattended point-of-sale (POS) terminals.
- standard protocol in the payments industry aiming to detect and prevent credit card fraud, and to protect credit card holders, merchants, and banks from security fraud which has been adopted by Visa, Mastercard, American Express, JCB, Discover, UnionPay, as well as many other regional card schemes - the Certificates and approvals related to 3DSS/ACS outsourcing services include for example: VISA - ACS Product Letter of Approval; VISA - 3DSS Product Letter of Approval, VISA - ACS EMVCo Letter of Approval, EMVCo - 3DS server EMVCo Letter of Approval, EMVCo -PCI 3DS Attestation of Compliance (AOC), PCI - PCI 3DS Report on Compliance (ROC).