



# Asseco South Eastern Europe Capital Group 2021 Non-Financial Report

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# Summary of Non-Financial Information for 2021



**1 147 million**  
PLN revenues

**3 392 employees**  
in the ASEE Group

**10 527 MWh**  
of energy consumed

**8 564 729 km**  
driven by company cars

**23 countries**  
where ASEE operates





# Letter from CEO

## 2. Letter from the CEO

Dear Stakeholders,

I am pleased to present to you our 2nd standalone non-financial report. 2021 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 aim to conduct business based on our core values i.e. Integrity, Respect and Credibility. Sustainability fits into. In 2021 we implemented Environmental Policy which includes climate crisis issues and we established Sustainability Team to support its implementation. The Environmental Policy includes activities aimed at reducing our GHG emissions. We also refreshed our Corporate Responsibility Policy. These changes aim to enhance understanding of how our business influences the planet and societies. As we are committed to be a 'green' company, we needed a framework which will support delivery of our sustainability oriented plans.

I continue to personally support preparation of the non-financial report. In 2021 we repeated our materiality analysis of our operations to validate the scope of the report. The Sustainability Team focused on data gathering and monitoring. The team worked continuously to ensure our 2021 report meets the EU Taxonomy requirements.

It was the second year of the global Covid-19 pandemic. This challenge has put additional requirements on how we make business and care about others. Therefore we decided that 2021 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

When preparing the report 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 2021
- The Regulation (EU) 2020/852 on Taxonomy

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. We considered two standards i.e. GRI (Global Reporting Initiative) and SIN (non-Financial Information Standard). The latter provides much simpler reporting framework than GRI. As we didn't want to exclude any companies from the reporting scope, we selected SIN (non-Financial Information Standard) developed by FSR (Foundation for Reporting Standards).

### Our performance

I hope that you will find our second 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 2021 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 3392 people in 23 countries and having generated over PLN 1 billion sales revenues in 2020, we have 69 certified management systems implemented, 10 527 MWh of energy consumed, out of which 11% coming from renewable energy sources, 3,9 MgCO<sub>2</sub>e per 1 million revenues of Scope 1 & 2 greenhouse gases emitted to atmosphere, 131 kg of waste emitted per 1 million PLN revenues, 8 564 729 km driven by company cars and we estimate that as in the last year we delivered 3,62 training hours per employee.

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





# **Business Model** **and Corporate Governance**



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

#### 3.1. THE COMPANY'S GROWTH STRATEGY AND DEVELOPMENT DIRECTIONS

##### G.1.1.

In 2022, the ASEE Group (incl. Payten) intends for each segment to concentrate on own solutions, increasing the role of own software and services, and offering own software and services in form of subscription and outsourcing, both for large enterprise clients and for retail merchants.

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

The ASEE Group continues expansion, both organic and by acquisitions directed at extending its scope of operations. Currently the Group operates in Central, South-Eastern Europe, Turkey, Egypt, Italy, Spain, Portugal, Colombia, Peru and Dominican Republic.

##### Summary of goals for 2022 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 2022 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 e-commerce solutions. Investments in existing solutions and further extension of range of services and geographical presence in e-commerce area.
- 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, both in e-commerce area and in physical payments (IPD).

- 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, in particular with regards to payment solutions dedicated to retail merchants.
- Sustainable development of an independent network of ATMs operating under the MoneyGet brand.
- Works on consolidation of competence centers in various geographies in specific areas of Payten operations.
- 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 through continuous expansion both organic and by acquisitions extends its scope of operations. Currently the Group operates in the Central Europe, South Eastern Europe, Turkey, Egypt, Italy, Spain, Portugal, Colombia, Peru and Dominican Republic. The Group activities are based on the main business segments:

- Payment solutions (operating as Payten)
- Banking solutions
- Dedicated solutions (other own solutions and third-party solutions)

#### A sales-oriented organization

The main task of the ASEE sales department (including Payten) for several years has been developing new markets and focusing on the most promising products and solutions.

Investments continue in resources necessary to serve international customers in ASEE and Payten regions with centralized structures and resources to sell to new markets.

In addition, work has begun on building a sales organization aimed at the retail market, not just the 'enterprise' market. The aim is to build the basic principles of the functioning of this part of the organization in 2022.

In 2022, the Group intends to continue sales activities aimed at increasing revenues from both the current operating area, including Central Europe, South-East Europe, Italy, Spain, Portugal and Latin America, as well as from new markets.

#### Improving the operational efficiency

##### Support

In 2022, it is planned to continue work on the system for managing the 'service desk' (Live) support process. Works continue on the implementation of consistent guidelines / principles for support processes in the Group.

##### International teams

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 have been established. Currently works progress to increase effectiveness of these teams.

## **Targets for managers**

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.

## **Product development expenditure**

In cooperation with sales and heads of product segments, the expenditure on product development was verified, which helped to rationalize the budget for software development by focusing on products of strategic importance for the Group.

In 2022, the Group intends to continue implementing the standards and improving operational efficiency. In the opinion of the Management Board, the consequence of these actions should be a significant reduction in unprofitable projects and higher utilization of resources, which should lead to a further increase in the profitability of own services.

## **Focus on strategic products and services**

Focus on the development of strategic products allows for greater dynamics of revenue growth from own solutions. This is one of the strategic goals set by the Group and there have been signs of improvement in this area for several years. In 2021, the value of revenues from proprietary solutions amounted to PLN 831 million, which means an increase by PLN 120 million (17%) compared to the previous year. In the process of 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.

The strategic directions of development in the area of products include, among others solutions in the field of digital transformation of banks, security systems, including anti-fraud systems in financial transactions and anti-money laundering solutions, solutions in the field of artificial intelligence (AI) and machine learning (ML), content management and Business Process Management (BPM), a multi-functional platform for customer service and Live sales support, solutions for traffic management and Smart City solutions, as well as e-commerce solutions, including payment services. Selected solutions will be offered in a subscription model (SaaS).

## **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. In recent years, the Group has implemented projects in, among others, Italy, Belgium, Morocco, Egypt, Kazakhstan, Kyrgyzstan, Nigeria, Malta and Saudi Arabia. In 2022, the Management Board plans to continue sales activities in markets beyond its current area of operation.

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.

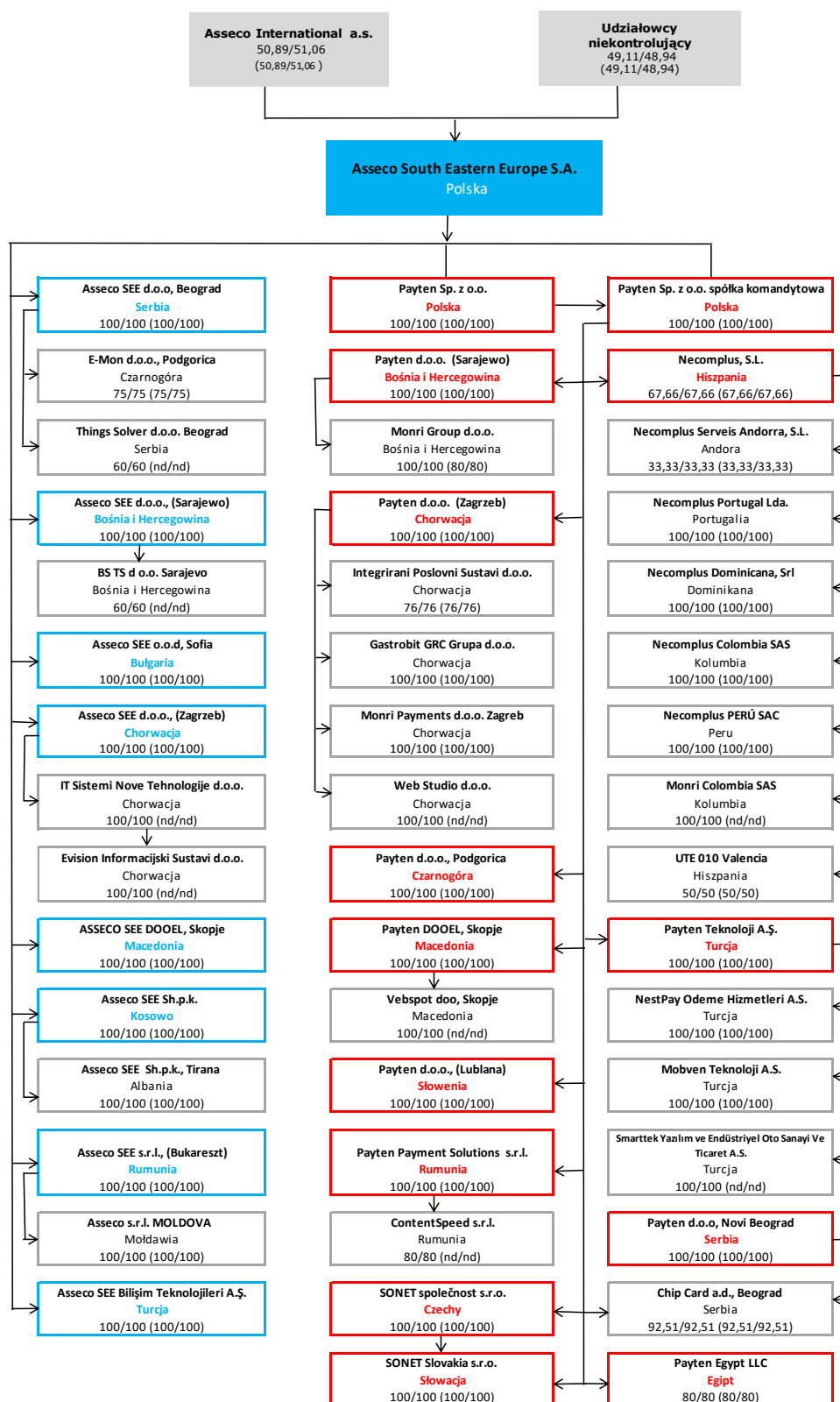
As at the date of publication of this report, i.e. as at February 23, 2022, the composition of the Management Board and Supervisory Board of the Company and the Audit Committee was as follows

<u>Supervisory Board</u>	<u>Management Board</u>	<u>Audit Committee</u>
Józef Klein	Piotr Jeleński	Artur Kucharski
Adam Góral	Miljan Mališ	Adam Pawłowicz
Jacek Duch	Michał Nitka	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 the first 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 was to nominate in 2021 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. ASSECO SOUTH EASTERN EUROPE CAPITAL GROUP



100/100 udział w głosach/udział w kapitale na dzień 31 grudnia 2021 roku (w %)  
(100/100) udział w głosach/udział w kapitale na dzień 31 grudnia 2020 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 have been renewed 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.

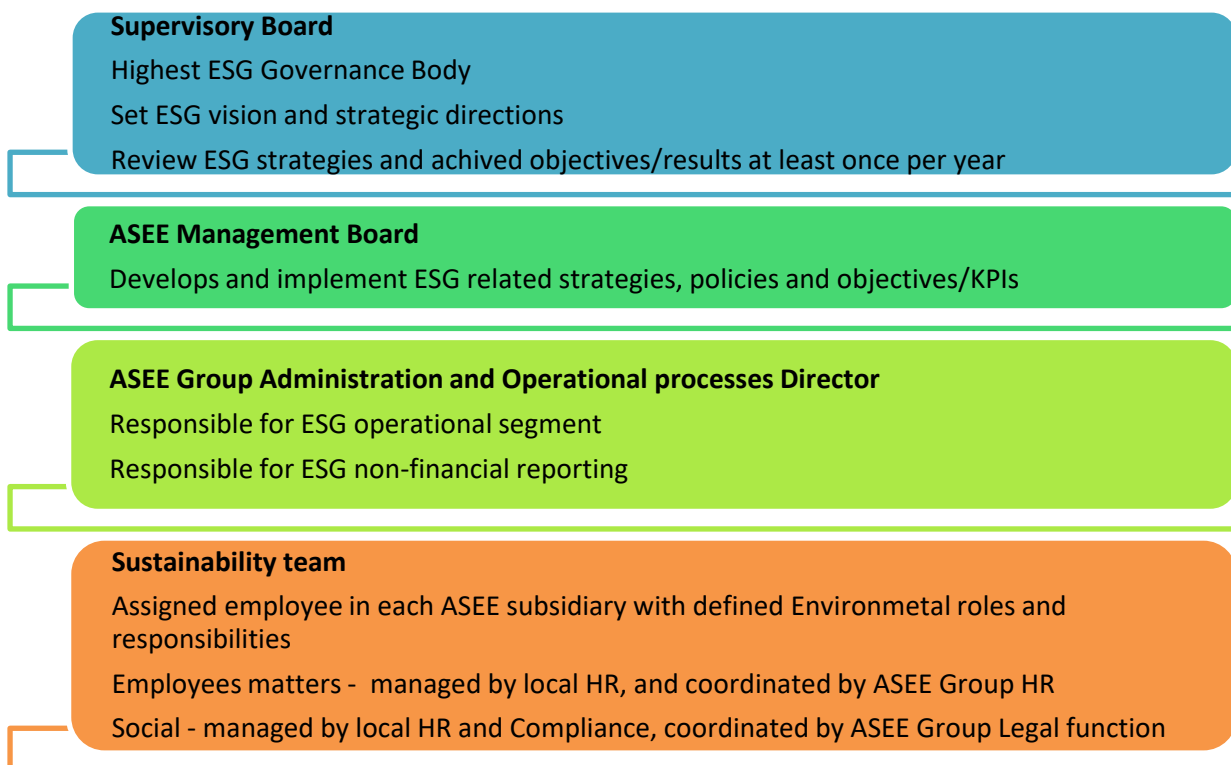
In scope of ESG, as part of internal control, the ASEE Group monitors compliance with the requirements of ISO 14001 in companies that have already implemented this standard.



Governance framework for non-financial matters includes various HR Group Policies and procedures, like e.g. Anti-Corruption, Conflict of Interest, Code of Ethics, GDPR. In addition, for 2022 ASEE strengthened its security management practices by establishing a Group Information Security structure governed by Group CISO.

### Internal control system regarding non-financial matters:

#### 1. ASEE ESG Governance structure



2. In January 2022, ASEE Group Legal function has appointed Compliance Officer who will be directly responsible for ensuring compliance with the ASEE Group Code of Ethics, Anti-Corruption and Conflict of Interest Policy, as well as design and implementation of Whistleblowing program in 2022.
3. ASEE Group HR through Group policies, procedures and standards governs employees and social matters in all ASEE subsidiaries. There is local HR function, which is subordinated to ASEE Group HR function, which provides sound framework for applying Group standards in local environments.
4. Information Security and data protection – In January 2022 ASEE Group CISO was appointed to govern information security and data protection. ASEE Group information security policies and standards will be introduced during 2022. Governance structure will be designed in order to implement unified ASEE Group principles, standards and tools within ASEE subsidiaries.

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. Due to limited size, many ASEE Group companies do not have 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.

Until 2021 there was no specific risk management framework to manage non-financial risks. Starting from our larger operations, in 2022 we intend to cascade the group level Environmental, Social or Governance risk assessment to a local level. Therefore in 2022 the risk assessment model will be re-designed to meet the local needs and the Sustainability Team members will assess potential risks relevant to their local environments.

#### G.3.2.

During the materiality re-assessment in 2021 the ASEE Group updated its risk assessment dedicated to social and environmental risks. List and short characteristics of the identified social or environmental risks is 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 2021. 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 continue in 2022.

### 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 2021 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 of 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 on-boarding 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.

No breaches of ethical standards were reported in year 2021.

#### G.4.6.

Based on HR procedures, newcomers are acknowledged with ethical standards included in the local and Group policies. Thus, in 2021-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 1,200 persons.

ASEE Group is very active in field of mergers and acquisitions projects and faced earlier issues connected with new entities on-boarding. Human Capital Management (HCM) is an HR tool which has been implemented at the Group level and is for all employees from their individual accounts. It enables the employees of new companies to quickly have access and control over the same trainings as other employees have.

ASEE Group in 2021 in parallel to extensive merger and acquisitions started preparing a set of formalized post-acquisition procedures. The procedures have been made available to all the newly joining companies. The common set of standards have been prepared with key business domain experts within the Group and consulted externally where applicable. The standards encompass all key business activities from sales, financials, controlling down to operational and delivery activities. In specific domains the standards are already supported by commonly agreed and provided tools. The standards have set grounds to a continuously improved process managed by the Business Development team within the group with additional focus put on the process improvement in 2022.

In addition, in order to fully utilize the potential of the latest merger and acquisitions each of the newly joined companies has been appointed with a post-merger integration lead, appointed extended post-merger team responsible for implementing the agreed standards, following the commonly established processes.



### 3.9. COMPLIANCE WITH THE TAXONOMY FOR ENVIRONMENTALLY SUSTAINABLE ACTIVITIES

The business activities of the ASEE Group are eligible in the EU Taxonomy of Environmentally Sustainable Activities in terms of revenues in 44% and in terms of capital expenditures in 44% and in terms of operating expenses in 32%.

The EU Regulation 2020/852 on establishing a framework to facilitate sustainable investments was adopted in 2020. On 4 June 2021, the European Commission issued the Delegated Regulation 2021/2139 specifying the technical screening criteria. It defines screening criteria for making a significant contribution to climate change mitigation and adaptation and not significantly harming other environmental objectives. The screening criteria for the remaining four environmental objectives have not been specified yet.

#### Taxonomy Implementation Process

The implementation process included the following steps:

Step 1: Determining the NACE activity codes in which the ASEE Group's economic activities are located. The analysis was conducted against the "NACE Rev.2 – Statistical classification of economic activities in the European Community".

Step 2: Identification of turnover, CapEx and OpEx in all ASEE Group companies. The identification used the methodology specified in the Annex 1 to the EU Delegated Regulation 2021/2178 issued on 6 July 2021 on content of the KPIs to be disclosed by non-financial undertakings (respectively the principles indicated in Annex 1, point 1.1.1. in respect of turnover, in point 1.1.2. with respect to CapEx and in point 1.1.3. for OpEx).

Step 3: Allocation of turnover, CapEx and OpEx to individual identified activities in all ASEE Group companies.

Step 4: Revenue, CapEx and OpEx data from all companies were consolidated at the Group level. Percentage of turnover, CapEx and OpEx attributed to each activity with NACE code was calculated at the Group level.

Step 5: It was determined whether activities carried out in the ASEE Group companies are defined as Taxonomy eligible in the EU Delegated Regulation 2021/2139 Annexes 1 and 2 for climate change mitigation and for climate change adaptation. and whether these sectors are included in the Taxonomy as taxonomy eligible

Step 6: The individual types of activity identified in the ASEE Group and classified in the Taxonomy to be reviewed in relation to the screening criteria as indicated in the Delegated Regulation 2021/2178. In each case, it should be assessed whether the activity meets the criteria for making a significant contribution to tackling climate change adaptation or climate change mitigation and for each activity it should be verified if it does not cause serious harm to other environmental objectives, in accordance with the criteria indicated in the Regulation. It should be also determined for each activity whether it is a transitional or supportive activity. Finally, it should be determined whether activities are carried out in such a way as to ensure compliance with minimum safeguards defined in the Regulation (*this step was initially planned but eventually postponed to the next year due to Article 10 of the EU Delegated Regulation 2021/2178, which limits the required disclosures in this year to Taxonomy eligibility*).

Step 7: Presentation sheets were prepared for Turnover, CapEx and OpEx in accordance with the templates included in Annex 2 to the EU Delegated Regulation 2021/2178.

It should be underlined that very few activities of the ASEE Group have been defined as Taxonomy eligible for making a significant contribution to climate change mitigation and adaptation. We expect that more of the ASEE Group activities will be Taxonomy eligible when the criteria for the remaining four objectives will have been defined. In 2021 the Regulation does not require verification of Taxonomy alignment. As the scope of our activities that are Taxonomy eligible in 2021 is very limited, the Management Board of the ASEE Group decided to limit this year's report to Taxonomy eligibility. As the alignment with Taxonomy was not verified for 2021 data, all Taxonomy eligible activities are reported as not Taxonomy aligned.

At the same time, it should be noted that during 2021 there were different interpretations of Taxonomy regulations, in particular with regards to Capex and Opex calculations. Therefore, the presented results of the analysis may change in the following years, when interpretations mature and clear market practice is defined.

## Proportion of turnover from services associated with Taxonomy-aligned economic activities in 2021

				Substantial contribution criteria							Do no significant harm (DNSH) criteria													
Economic activity	NACE Codes	Turnover	Proportion of turnover	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	Taxonomy - aligned proportion of turnover in 2021	Taxonomy - aligned proportion of turnover in 2020	Category (Enabling activity)	Category (transitional activity)				
		PLN k	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	E/T	E/T				
A. TAXONOMY ELIGIBLE ACTIVITIES																								
A.1. Environmentally sustainable activities (Taxonomy-aligned)																								
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)			-	0%	0%	0%	0%	0%	0%								0%	0%	0%	0%				
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																								
Computer programming activities		J62.01	307 523	26,8%																				
Other information technology and computer service activities		J62.09	31 013	2,7%																				
Data processing, hosting and related activities		J63.11	163 286	14,2%																				
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)			501 822	44%																				
Total (A.1 + A.2)			501 822	44%																	0%			0%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																								
Turnover of Taxonomy-non-eligible activities (B)			644 827	56%																				
Total (A+B)			1 146 649	100%																				

## Proportion of CapEx from services associated with Taxonomy-aligned economic activities in 2021

Report of CapEx related to Taxonomy-eligible Economic Activities in 2021																					
Economic activity	NACE Codes	CapEx	Proportion of CapEx	Substantial contribution criteria						Do no significant harm (DNSH) criteria						Minimum safeguards	Taxonomy - aligned proportion of CapEx in 2021	Taxonomy - aligned proportion of CapEx in 2020	Category (Enabling activity)	Category (transitional activity)	
				Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems						
		PLN k	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	E/T	E/T	
A. TAXONOMY ELIGIBLE ACTIVITIES																					
A.1. Environmentally sustainable activities (Taxonomy-aligned)																					
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		-	0%	0%	0%	0%	0%	0%	0%								0%	0%	0%	0%	
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																					
Computer programming activities		J62.01	7 804	17,2%																	
Other information technology and computer service activities		J62.09	76	0,2%																	
Data processing, hosting and related activities		J63.11	12 028	26,5%																	
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)			19 908	44%																	
Total (A.1 + A.2)			19 908	44%																	
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																					
CapEx of Taxonomy-non-eligible activities (B)			25 487	56%																	
Total (A+B)			45 395	100%																	

## Proportion of OpEx from services associated with Taxonomy-aligned economic activities in 2021

				Substantial contribution criteria							Do no significant harm (DNSH) criteria													
Economic activity	NACE Codes	OpEx	Proportion of OpEx	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	Taxonomy - aligned proportion of OpEx in 2021	Taxonomy - aligned proportion of OpEx in 2020	Category (Enabling activity)	Category (transitions activity)				
		PLN k	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	E/T	E/T				
A. TAXONOMY ELIGIBLE ACTIVITIES																								
A.1. Environmentally sustainable activities (Taxonomy-aligned)																								
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)			-	0%	0%	0%	0%	0%	0%								0%	0%	0%	0%				
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																								
Computer programming activities		J62.01	10 627	13,5%																				
Other information technology and computer service activities		J62.09	46	0,1%																				
Data processing, hosting and related activities		J63.11	14 217	18,1%																				
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)			24 890	32%																				
Total (A.1 + A.2)			24 890	32%																	0%			0%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																								
OpEx of Taxonomy-non-eligible activities (B)			53 658	68%																				
Total (A+B)			78 548	100%																				





# Key Non-Financial Performance Indicators

## 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 most of these 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 have been refined in 2021, but there may be some room for improvement in the future.

From these indicators the Management Board selected 5 key performance indicators which are used in strategic and operational decision-making. As the ASEE Group continues to grow, in case of activity related metrics, it's more appropriate to monitor volumes in relation to the revenues than to monitor absolute values. Therefore, it was decided to use Greenhouse gases emissions per revenues (E.5.3) as KPI, instead of Weight of emitted greenhouse gases (E.5.1)

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.5.3. Greenhouse gases emissions per revenues.

E.6.4. Waste emissions per revenues.

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

Summary of the KPI results in 2021 is represented on page number 4.

During 2021 the ASEE Group:

- increased the number of management certificates from 63 to 69: it confirms the Company's focus on adequate quality and reliability of services delivered,
- increased the percentage of energy coming from renewable energy sources from 0,1% to 11%: whilst the Company prefers to select suppliers offering more green energy mix, part of this increase may be attributable to lack of data from some of our energy suppliers in 2020,
- reduced Scope 1 & 2 greenhouse gas emissions by 14% from 4,55 MgCO<sub>2</sub>e per 1 million PLN revenue to 3,90 MgCO<sub>2</sub>e per 1 million PLN revenue: the reduction comes mainly from lower consumption of energy in building (Scope 2), which may be attributable to the hybrid work model and covid-19,
- increased waste emissions per revenues by 4% to 131 kg per 1 million revenues: this increase has been mostly driven by much higher volume of municipal waste reported in 2021; the issue will require further attention to determine if this increase results from quality of data collected or indeed results from company activities,
- estimates that number of training hours per employee remains on the same level as in 2020 i.e. more than 3 hours. In 2022 we are focusing to increase the number of trainings and better monitoring of training hours thanks to the implementation IT system.

Whilst we are confident these topics should be our non-financial priorities, the Company started to monitor some of data to measure these KPIs from 2020. Therefore, our view of baseline performance is not adequate due to global Covid-19 pandemic. We believe that this data is not representative to serve as a baseline to set long term targets.

Therefore, we decided not to define measurable targets for our non-financial KPIs. We will keep these priorities in mind when defining our 2022 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 2022 when the business is back to normal.





# Environment

## 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.

In 2021 ASEE Group has implemented a groupwide environmental policy to manage its impact on climate and environment. With this new policy the ASEE Group (including Payten) aims to:

- Reduce energy and natural resources used
- Contribute to managing the climate crisis by reduction GHG / carbon emissions
- Increase proportion of energy used generated from renewable sources
- Take care for local environment

As a result of this new policy, every local company has nominated a “Sustainability Officer” responsible for local implementation of environmental policy. Together with the Group Policy Owner they form ASEE Sustainability Team. In 2022 ASEE Group will consider defining specific environment related targets to achieve.

### 5.1. CLIMATE CHANGE

Our planet's average surface temperature has risen about 1.18 degrees Celsius since the late 19th century, a change driven largely by increased greenhouse gas (GHG) 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

#### Climate change risks and opportunities

The risk management process in 2021 focused more on the evaluation of risks and opportunities connected with the climate change. The overall impact of climate related risks to the ASEE Group operations has been evaluated as medium. Due to lack of energy intensive production lines, materiality of climate issues is fairly limited. The table below provides the main risks and opportunities related to climate crisis.



Climate change	Climate risks	Climate Opportunities
1. Legal risk	<p>1.1. Impose additional environmental and social taxes and/or carbon reduction regulations to decrease CO2 emissions</p> <p>1.2. 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</p>	<p><b>General</b></p> <p>1. Upgrading car fleet to electric cars may both reduce GHG emissions and reduce car servicing operational expenses and maintenance costs</p> <p>2. Promote our products and services as innovative technologies that contribute to digitalization and have positive impact on reduction of climate risks.</p> <p>3. Cost optimization - effective and efficient usage of electricity, heating, working space, resources (human and operational).</p> <p>4. 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</p>
2. Operational risk	2.1. Lack of workforce due to mental and physical health issues caused by increased temperatures, allergies, air pollution etc.	
	2.2. Risks of fire, floods, earthquakes and their impact on companies' operational assets (offices, Data centers, internet connections etc.) due to increase temperatures, rising sea levels, extreme weather conditions	
	2.3. Lack of operational resources or increased prices of resources (PCs, servers, routers, and other equipment) due to changes in supply chain, production, prices and scarcity of input materials	
3. Consumption of fuels and energy	3.1. Risk of significant increase of electricity prices and electricity consumption that may lead to increase of operational expenses	
	3.2. Risk of significant increase of fuel prices and fuel consumption that may lead to increase of operational expenses	
4. Reputational risk	Increase expectation and demand for climate actions by all relevant stakeholders (employees, clients, vendors, suppliers, shareholders, regulators)	
5. Business risk	Global warming may result in reduced tourism traffic which may reduce demand for traditional payment methods with cash (ATMs) and credit cards (POSs) may reduce company revenues	

### Climate-related policy

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.

The Management Board decided to include climate related issues in the Environmental Policy implemented in 2021. The main climate related issue in the Environmental Policy refers to greenhouse gas emissions. The carbon emissions result from fuel and energy consumption. Reduction of the carbon emissions has been stated as one of the key objectives of the Policy.

In order to reduce GHG emissions, the Company promotes use of electric and hybrid vehicles. Other actions aiming to reduce negative influence of ASEE Group operations on climate change are discussed in the following chapters below.

## The management of climate related issues in the ASEE organizational structure

We govern climate change risk in the context of environmental management structure. Structure includes a senior management position at the Group level and a sustainability officer responsible also for climate issues in each company. More detailed information about the management structure has been provided in the section 3.6 above.

## 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 2021				2021 vs 2020	Total Energy 2020
		Mg	MWh	%	MWh
Car Fuel	Gasoline	133	1 821	+11%	1 639
	Diesel	293	3 577	+2%	3 502
	LPG		129	N/A	
	EV		5	N/A	
Buildings	Energy		3 469	-10%	3 859
	Heat		1 528	+22%	1 250
Total Energy consumption			10 527	+2,7%	10 249
<b>Total Energy per revenue (MWh/1 million PLN)</b>			<b>9,18</b>	<b>-8%</b>	<b>9,98</b>
including Energy from Renewable energy sources			1 167	+12 700%	9,1

### E.2.1.

ASEE Group (including Payten) used 10 527 MWh of energy in 2021. We succeeded to validate the energy sources with the suppliers in our markets and in 2021 we have evidence that 11% was generated by renewable energy sources. The remaining 89% is reported as 'non-renewable'. ASEE Group will analyze in 2022 options to increase the energy used 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 2021 company cars made 8 564 729 kilometers with resulted in combustion of 567 260 liters of fuels. Whilst the company aims to reduce energy consumed, it may be a challenge to use 2021 as a baseline year. Mobility increased comparing to 2020, but due to Covid-19, it was certainly below normal annual average. As sustainability is increasingly important to ASEE Group, the Company introduced in 2021 a new Group Vehicle policy that encourages purchasing of hybrid and electrical vehicles and thus aims to decrease conventional, less ecofriendly fuel consumption

### E.2.2.

ASEE Group also monitors energy consumption from renewable energy sources. About 11,2% of energy consumed came from renewable energy sources. Expanding the use of renewable energy throughout all our companies 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. The Company will aim to define strategic and long-term actions in 2022, since this segment will include additional investments.

### **E.2.3.**

Energy consumption in relation to revenues is monitored. The ASEE Group used 9,18 MWh of energy per 1 million PLN revenue. It means 8% reduction compared to the previous year. The ASEE Group has a long-term aspiration to reduce this indicator. One of opportunities identified is further digitization of services offered. The above-mentioned long-term plan will define other opportunities for energy use reduction.

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. As stated above in point 5.1, the Board wants to actively manage our activities with the purpose to combat climate crisis by reducing our GHG emissions. 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 is 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 second ASEE non-financial report, the focus in 2020, as the first year of reporting was to determine all relevant sources of GHG emissions and transparently explain reported data. In 2021 the company continued to build 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
- Set long term GHG reduction targets.

In 2022 the Company will aim to implement quarterly reporting of GHG emissions, which should be regularly monitored by the Sustainability team and reported to the Board.

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. 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 2021 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 larger suppliers of the Group conducted in 2021, led us to conclude that including in our report their data from the previous year might distort our report because of mixing data from two different years, because their publication for 2021 is yet to come

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 will continue to review of its outsourced services to determine possible changes in its Scope 3 reporting for 2022.

During 2021 the Company contacted our main outsource suppliers with the purpose to identify their GHG emissions attributable to the ASEE Group and report them in Scope 3. The outsourcers add business value by adopting a different business model i.e. they combine servicing the ASEE Group facilities with servicing other facilities. This enables the outsourcers to significantly reduce distance travelled to service the ASEE facilities, which consequently reduces GHG emissions. Unfortunately, these outsourcers were not able to determine their part of GHG emissions which could be assigned to the ASEE Group in Scope 3. We will continue working with these outsourcers, with the purpose to find a way to capture these scope 3 emissions in the future.

### TRACKING EMISSIONS OVER TIME

Due to Covid-19, year 2020 and 2021 are 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 2022 will probably not be used for goal setting either.

### ACTIVITY DATA AND EMISSION FACTORS

Activity data were collected from all ASEE Group companies. In 2021 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](http://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 (kgCO<sub>2</sub>e per kWh) in: 2022\_01\_emissions\_factors\_sources\_for\_2021\_electricity\_v10.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	MgCO2e
Scope 1	Cars	Gasoline	2 433 691	km	590,11
		Diesel	5 906 457	km	1665,40
		LPG	201 966	km	47,25
		EV (electric vehicles)	22 615	km	0,00
	Generators	Diesel (to produce energy)	357	liter	0,96
Scope 2	Buildings	Energy	3 468 644	kWh	1 561,00
		Heat	5 499 100	MJ	605,60
Scope 3	Travel	Air travel	330 049	passenger – km	27,89
		Rail travel	8 653	passenger – km	0,05
	Shipping	Ground/truck shipping	452 995 701	kg – km	48,91
		Air shipping	226 867 811	kg – km	134,46
		Rail shipping		kg – km	0,00
		Ocean/water shipping	11 481 091	kg – km	0,18
Total Scope 1 emissions					2 304
Total Scope 1 + 2 emissions					4,470
Total Scope 1 + 2 + 3 emissions					4 682
Total Scope 1 emissions per revenue (MgCO2e / million PLN)					2,01
Total Scope 1 + 2 emissions per revenue (MgCO2e / million PLN)					3,90
Total Scope 1 + 2 + 3 emissions per revenue (MgCO2e / million PLN)					4,08

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 2021 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 decided to continue to apply centralized approach for Scope 1&3 because of the complexity of manual data collection process. When the data collection process becomes automated in the future, ASEE Group will consider decentralized approach for future reports, as it may increase climate risk awareness of all local companies.

Emission factor uncertainty for CO<sub>2</sub> 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](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 2 304 MgCO<sub>2</sub>e of Scope 1 greenhouse gases to the atmosphere. Together with Scope 2, the Group's emissions in 2021 were 4 470 MgCO<sub>2</sub>e.

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 2021 was 3,90 MgCO<sub>2</sub>e/million PLN. As in case of total weight of GHG emissions, only Scope 1 and 2 is included in this metric. As mentioned above the improvement of this KPI is mainly attributable to less energy used in offices in 2021. This was possible due to the hybrid work model. Implementation of this model was facilitated by covid-19, but the Board intends to use it as normal operating mode also after the covid pandemic ends.

GHG emissions yoy comparison	2021 MgCO <sub>2</sub> e	2020 MgCO <sub>2</sub> e	% 2021 vs 2020
Total Scope 1 emissions	2 304	2 189	+5%
<b>Total Scope 1 + 2 emissions</b>	<b>4 470</b>	<b>4 666</b>	<b>-4%</b>
Total Scope 1 + 2 + 3 emissions	4 682	5 285	-11%
Total Scope 1 emissions per revenue (MgCO <sub>2</sub> e / million PLN)	2,01	2,13	-6%
<b>Total Scope 1 + 2 emissions per revenue (MgCO<sub>2</sub>e / million PLN)</b>	<b>3,90</b>	<b>4,55</b>	<b>-14%</b>
Total Scope 1 + 2 + 3 emissions per revenue (MgCO <sub>2</sub> e / million PLN)	4,08	5,15	-21%

More detailed breakdown of GHG emissions trends between 2021 and 2020 is presented in the table below:

GHG emissions yoy comparison				2021 MgCO <sub>2</sub> e	2020 MgCO <sub>2</sub> e	% 2021 vs 2020
GHG Scope	Activity		Unit			
Scope 1	Cars	Gasoline	km	590,11	520,14	+13%
		Diesel	km	1 665,42	1 617,84	+3%
		LPG	km	47,25	50,36	-6%
	Generators	Diesel (used to produce energy)	liter	0,96	0,84	+14%
Scope 2	Buildings	Energy	kWh	1 561,00	1 952,29	-20%
		Heat	MJ	605,60	524,14	+16%
Scope 3	Travel	Air travel	passenger - km	27,89	17,76	+57%
		Rail travel	passenger - km	0,05	0,83	-94%
	Shipping	Ground/truck shipping	kg - km	48,91	275,59	-82%
		Air shipping	kg - km	134,46	325,19	-59%
		Ocean/water shipping	kg - km	0,18	0,26	-30%

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.

The main improvements delivered in 2021 include:

- ASEE Vehicle Policy providing incentives for acquisition of hybrid or electronic vehicles – this will enable significant reduction of Scope 1 emissions over longer time
- Hybrid Work procedure which enables all employees to partially work from home – this will enable office space reduction in the future which will result in energy consumed in Scope 2 segment
- Office software standard selected which will establish videoconferencing as integrated part of our way of conducting business. This way of operating will stay even after covid-19 – this should enable the Company to keep the travel related Scope 3 emissions at the low level

During 2022 the Company aims to define a Long-Term Plan for each opportunity stated above.

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.

Total weight of waste of ASEE Group (including Payten) exceeds 150 698 kg. 20 108 kg falls into hazardous waste category and 130 590 kg are non-hazardous. ASEE Group companies fully comply with all local waste management regulations.

			2021	2020
20	<b>COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES</b>	kg	<b>105 935</b>	<b>115 696</b>
20 01 35*	discarded electrical and electronic equipment containing <u>hazardous</u> components	kg	20 049	16 291
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 35	kg	85 635	97 497
20 01 33*	batteries and accumulators containing <u>hazardous</u> components	kg	59	75
20 01 34	batteries and accumulators other than those mentioned in 20 01 33	kg	193	1 833
15 01	<b>packaging (including separately collected municipal packaging waste)</b>	kg	<b>10 706</b>	<b>9 131</b>
20	<b>municipal waste</b>	kg	<b>34 057</b>	<b>4 715</b>
	<b>TOTAL WASTE</b>	kg	<b>150 698</b>	<b>129 542</b>
	<b>waste containing hazardous components</b>	kg	<b>20 108</b>	<b>16 366</b>
	<b>waste NOT containing hazardous components</b>	kg	<b>130 590</b>	<b>113 176</b>
	<b>Waste emissions per revenues (kg / 1 million PLN)</b>		<b>131,42</b>	<b>126,20</b>

In case of office-based operations only municipal waste is generated. ASEE Group companies produced 34 tons of municipal waste in 2021. Compared with 2020, the increase in municipal waste area results from improved data collection process and gradual return to offices after a pandemic 2020. In addition, packing resulted in more than 10 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 105 935 kg of such waste, 20 049 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. In 2021 we have tracked better the proportion of waste recovery. Depending on the composition of electronic waste processed, the level of recovery (re-absorption) of the material is between 90% and 95%. The rest is properly disposed in accordance with legal requirements. In Slovenia we

decreased our electrical waste substantially, as we've implemented local repair service and use old/broken electronic equipment (POS terminals) for spare parts.

Until 2021 not all ASEE companies have tracked in detail management method of its waste. For that reason, this indicator will be monitored closely from 2022.

The Company aims to improve its monitoring of waste management method. As non all of the ASEE Group operations are in the EU, the monitoring standards and regulations vary significantly, which makes the process of more detailed data consolidation very challenging. The ASEE Group will continue its efforts to improve the quality of information about waste management methods.

#### E.6.4.

ASEE Group emitted 131 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

Environmental risks related to climate crisis have been presented in the section 5.1. above.

Other key environmental risks include:

- Air emissions
- Energy prices
- Waste management

Risk description	Risk mitigation action
Air emissions may result in 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	ASEE Group introduced incentives for local companies to start replacing diesel car fleet with cars more advanced technologically electric and hybrid cars. It may both reduce GHG emissions and reduce car servicing operational expenses and maintenance costs
The risk of a significant increase in electricity prices - may result in a proportional increase in the Company's operating costs.	ASEE Group companies have a clear view of their technical assets. In case of energy price increase, it will enable quick verification which older, more energy-intensive appliances used should be replaced with the energy-efficient ones, thus resulting in reduction of cost of energy consumed and in reduction GHG emissions
The risk of poor Waste Management of municipal waste and electrical / electronic equipment that could lead to pollution and financial penalties	The Company strictly applies legal requirements and cooperates with professional operators with appropriate permits for waste treatment.

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# Employee

## 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 of December 31, 2021, ASEE (including Payten) employed 3 392 people.

gender	gender split (HC)	gender split (%)
female	1195	35%
Male	2197	65%

The employment structure of ASEE by gender was dominated by men, of whom 2197 at the end of 2021, which constituted 65% of all employees. Among all the employed, 616 people were employed under fixed-term employment contracts, of which 80 were women and 536 men, and 2776 people were employed under permanent contracts, of which 1115 were women and 1661 men.

Contract type	Age bracket & gender	Number of employees
<b>Definite</b>		<b>616</b>
	<b>Female</b>	<b>80</b>
	≤ 30	<b>42</b>
	30-40	<b>26</b>
	40-50	<b>9</b>
	>50	<b>3</b>
	<b>Male</b>	<b>536</b>
	≤ 30	<b>249</b>
	30-40	<b>187</b>
	40-50	<b>88</b>
	>50	<b>12</b>
<b>Indefinite</b>		<b>2776</b>
	<b>Female</b>	<b>1115</b>
	≤ 30	<b>355</b>
	30-40	<b>376</b>

	40-50	<b>270</b>
	>50	<b>114</b>
	<b>Male</b>	<b>1661</b>
	≤ 30	<b>483</b>
	30-40	<b>511</b>
	40-50	<b>493</b>
	>50	<b>174</b>
	<b>Grand Total</b>	<b>3392</b>

### S.2.2.

In 2021, a total of 566 employees were employed, of which 239 were women and 327 men.

### S.2.3.

The number of people who left the organization in 2021 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 2022.

### 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 number of women we want. Currently 35% 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.

In the senior managerial group, men's salaries are on average higher than women's salaries by 20%. Among the remaining employees, men's salaries are on average higher than women's salaries by 27%. As shown by the presented employment statistics, in the IT industry the vast majority of employees are men. A significant proportion of the employed women occupy positions in the back office. In addition to the managerial staff,

the highest salaries are paid to top-class IT specialists, most of whom are men. This explains the spread between the salaries of men and women, which is higher than for the managerial staff.

The above analysis is high-level, as there are significant differences in the number of employees in individual employee groups. In the coming years, the Company will aim to monitor the relationship of average wages and salaries of men and women in more detail.

#### 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 13688%

#### 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:

The number of trainings hours in 2021 amounted 10131. In 2021, we did not manage to collect all the information. Due to the gradual implementation of the computer system in 2021 in various companies, information on training courses was scattered in many different places. We estimate that our training activities in 2021 were at the same level as in 2020. The average number of training hours per employee is estimated at 3,62. In 2022, we are focused on increasing the number of trainings. Thanks to the implemented system supporting the management of HR processes, we will be able to accurately monitor the number of trainings.

The 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. During the outbreak of the COVID-19 virus epidemic in 2020 and 2021, 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. In 2021 health and safety has been recognized as main focus area by employees in materiality survey. Based on that the company is going to continue the activities and make special effort in that area in order to deliver required level care and quality. In 2022 company is going to introduce remote work policy. All entities will be required and revise local health and safety arrangement and adjust working conditions to new rules.

#### 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 irrespectively 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 Group 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
Risk of insufficient team competences	Every year, training courses are organized to raise the qualifications and competences of employees. Employee remuneration includes a variable part depending on the levels of achievement of goals, and a benefit package
Risk of wage pressure	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.
The risk of lack of employees as a result of COVID-19 infection	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.



# Society

## 7. Society

### 7.1. PUBLIC AID AND PUBLIC SECTOR CONTRACTS

#### S.1.1.

Total value of public aid was about 1 423 thousand PLN. Necomplus in Portugal received a loan aiming to support the company in managing impact of Covid-19.

Public Aid	2020 kPLN	2021 kPLN
Subsidy, aids, grants to salaries or other remuneration costs	1 155	48
General COVID-19 related aid, for no particular costs	87	0
Decrease of taxes or social security costs, tax reliefs	797	0
Loans, credits or credit lines.	899	1 375
Other	66	0
Total aid received	3 004	1 423

#### S.1.2.

Revenues coming from public sector were about 90 060 thousand PLN. The main source of public sector revenues were central and local governments. Overall revenues coming from public sector accounted for about 7,8% of ASEE Group revenues. Such range is in line with management expectations.

Public Sector Contracts	2020 kPLN	2021 kPLN
Central and local governments	61 590	66 256
Social Security	378	323
Uniformed Services	6 432	9 583
Other Public Administration Entities	8 743	13 899
Total sales revenue from public sector	77 143	90 060

### 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. With that in mind, ASEE implemented a CSR Policy in 2021. The main objectives of the policy include working with local communities, inspiring our employees to use their passion and professional skills to serve the communities. We aim to engage in building of skills like digital literacy, creativity, collaboration and communication and focus on persons from disadvantaged sections of society. ASEE aims to build an image of a Company as a socially responsible citizen.



The company continues to promote and support CSR activities and encourages employees to get involved in social initiatives. In 2021, despite the difficult situation and limitations related to COVID-19, employees took part in numerous CSR initiatives, including:

### **Make a Wish!**

This year, as Mobven Turkey, we have made a young person's dream come true by donating a laptop to them through the "Make a Wish" Association. They could not afford buy it and are fighting with a serious illness. In this way, we aimed to encourage them to overcome their illness and to show that nothing is impossible.

### **Supporting Education**

ASEE and Payten Turkey supported the Darüşşafaka Society for 2021 Project. We did donations on special days and celebrations.

Darüşşafaka Society was founded in 1863 with the aim of providing equality of opportunity in education to needy, talented children who had lost their fathers and mothers. Inviting students at the age of ten, the Society provides full scholarship and boarding from a student's fifth year through to the end of high school.

### **High School Petrinja – After Strong Earthquake**

On 29 December 2020, an earthquake of magnitude 6.4 Mw hit central Croatia, with an epicenter located around city of Petrinja. High school in old building in city center was destroyed.

ASEE Croatia and employees immediately responded by donating laptops for students of lower socio-economic status who needed them for online schooling. Few months later ASEE employees came to Petrinja with paints and varnishes to help with bringing children back to old-new school building.

### **Elementary School „Antun Gustav Matoš“ in Vinkovci**

At the end of 2021, ASEE and Payten in Croatia and employees equipped the primary school "Antun Gustav Matoš" in Vinkovci, a town in Croatia, with additional equipment. This school is characterized by the fact that in addition to regular classrooms, it also has departments for students with special needs. Their need was additional equipment to work with these students. We donated Play Attention and all additional programs for auditory processing, oculomotor coordination, social skills, working memory, spatial memory, motor skills, math games and lotus; Numicons and interactive whiteboards.

### **Support for Education - Robotica – Gheorghe Lazar National Highschool**

TITANS RO017 was founded in 2016 by "Gheorghe Lazar" National College in Bucharest, as the Robotics Team who will represent the College at the BRD FIRSTTech Challenge ("FTC"), the most important International Robotics Competition in Romania, with over 150 teams from all over the country. The main goal of this competition is to build a robot capable of completing specific tasks during matches.

Starting with 2021, ASEE Romania initiated the support for the Robotics Team TITANS. In this way the company has met its organizational goal for community support by helping talented students achieve their educational goals and become productive members of the future workforce.

### **Bookland – Renovating Schools from Romania & Sustaining Educational Camps**

Supporting equality in children's rights, Bookland have assumed the renovation of as many rural schools as possible to give them a chance at a quality education. The Association was born out of the desire to help young people rediscover their love for reading, believing that only through education society will evolve and we will be better, more smiling...more curious. Last year only, they've renovated 14 rural schools and this year they will modernize another 23!



ASEE Romania was honored to become part of this amazing journey, because, same as they do, we believe in our country's present and future, seen through the eyes of young people. We strongly believe that personal education and development are indispensable when we talk about the future of our children.

#### **Sonet, Member of Payten, Provides Donation Terminals for McCharity**

Sonet has supplied its partner (the Ronald McDonald House Foundation) with payment technology and modern payment terminals for McCharity (a charity terminal), which will allow contactless payment by credit card. All is needed to do is to attach your payment card to the charity kiosk, which already has a pre-set donation amount. The donation amount and purpose are communicated via a sticker attached to the terminal or a banner standing next to it (<https://www.paytenpos.cz/articles/mccharity>).

#### **ASEE Macedonia Donates Equipment to Hospital for Immuno-biology in Skopje**

During the 2021, ASEE Macedonia supported a CSR project in the field of healthcare, by donating IT equipment – lap tops, monitors and UPSs for the Hospital for Immuno-biology in Skopje.

#### **Necomplus, Member of Payten, Supports Spanish Red Cross Project**

On the occasion of Environment Day, Necomplus collaborated with the Spanish Red Cross - Cruz Roja Responde Project, to improve the energy efficiency of the homes of several disadvantaged families in Alicante, a city in Spain by subsidizing the purchase of essential equipment with a donation of 1.000€. This initiative, also linked to the #CompromisoNecomplus project, promotes Corporate Social Responsibility as a way to benefit our social environment

### **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 are 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 2021 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 600 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).

The ASEE Group aims to further improve anti-corruption practice through introduction of whistleblowing program in 2022.

#### 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 provide 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 co-operates with the biggest players as e.g. Diebold Nixdorf, having its own strict anti-corruption program.

#### S.10.2.

In 2021 there was reported in ASEE Group one case of suspected corruption based on notification received by Asseco SEE s.r.l. Romania from ANAF - Regional Anti-Fraud Department of Bucharest. The notification concerned one corruption case that lasted in years 2015-2019.

No other cases of suspected corruption have been identified since 2019 so far.

#### S.10.3.

Based on notification received in 2021 by Asseco SEE s.r.l. Romania from ANAF - Regional Anti-Fraud Department of Bucharest, during year 2021 has been initiated a disciplinary action to confirm the validity of the allegations of corruption. After the disciplinary investigation, Asseco SEE s.r.l. Romania found that in period of 2015-2019 some unpermitted gift vouchers were sent by the third party directly to the company's employee. Following disciplinary action, it was ordered to sanction the violation in line with the provisions of the Internal Regulations, of the Collective Labor Agreement and considering the provisions from Anti-Corruption Policy.

### 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 2021, 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 – Electronic Cash Register 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.

Recognising the need to ensure compliance with GDPR the Management Board of Asseco South Eastern Europe SA on 25th of February 2021 adopted the Resolution no.1 on appointment of the company's Data Protection Officer. At the moment the issues of personal data protection, also including binding group standards, are additionally supervised by Data Protection Officer who is an external high-level specialist in the scope of personal data protection.

In 2021 the ASEE Management Board decided to create a new role aiming to improve data management i.e. Chief Information Security Officer. The CISO was appointed in 2021 and started to work for the ASEE Group on the 1<sup>st</sup> of January 2022. The Group CISO will enhance governance structure to improve information/data security. He will be supported by a team of local security officers, who will be appointed in 2022.

Due to nature of the services, in particular the ones provided to banks, the companies of the Group maintain 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.

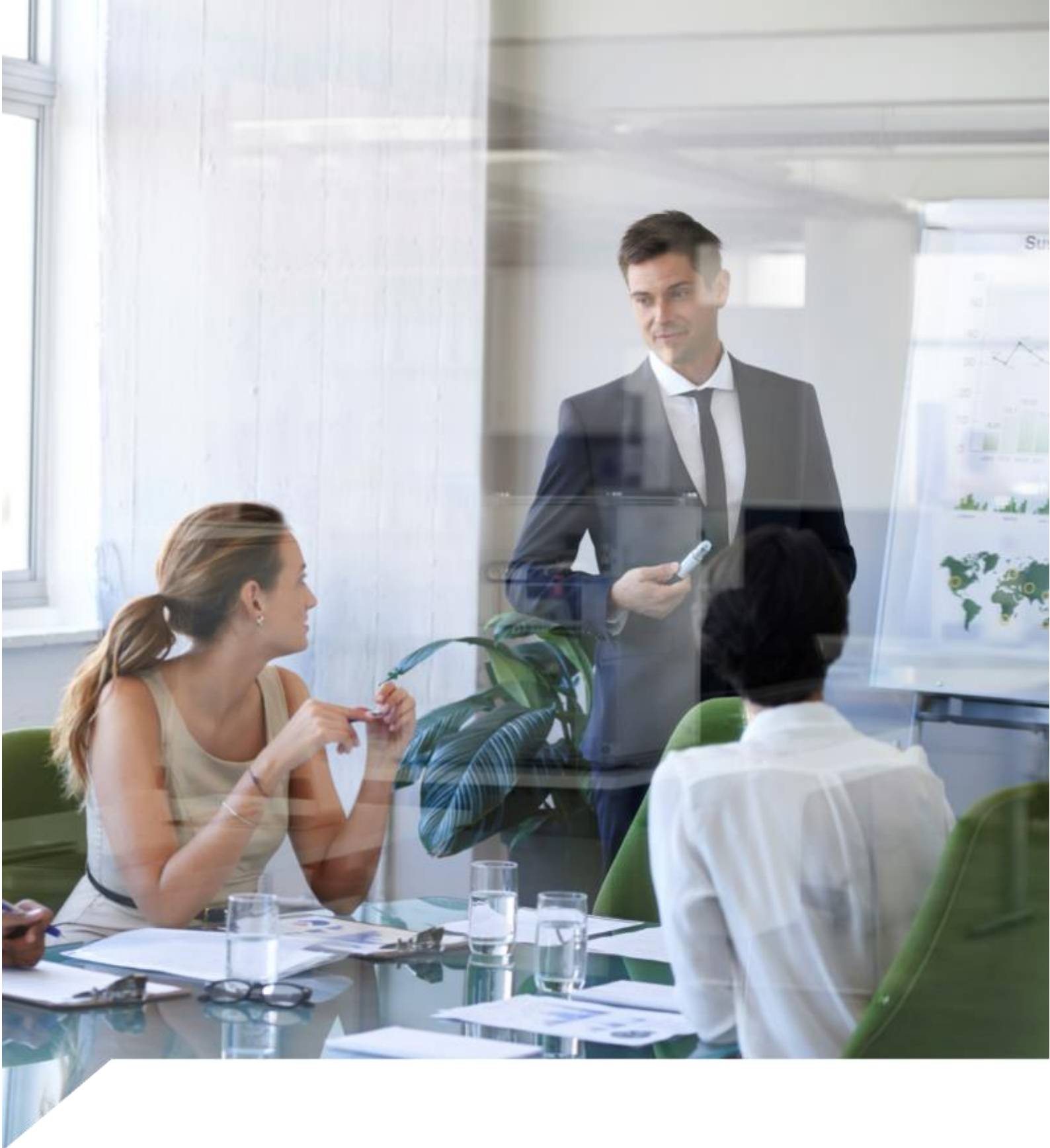
There have been no administrative proceedings against the company for anti-competitive and anti-market behaviors.

## 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>
<p>Use of public aid and public orders</p> <p>Risk of not fulfilling contractual terms and conditions and set standards in public sector projects.</p> <p>and</p> <p>Use of public subsidies/economic support and benefits not in accordance with the required beneficial terms and conditions.</p>	<p>Project Management Methodology applicable for all projects, including public sector projects.</p> <p>Monitoring project development, implementation and financial aspects by project manager and/or sponsor in order to insure highest standards and compliance with contractual and regulatory requirements.</p>
<p>Local communities and social involvement</p> <p>Reputational risk arising from negative public perception of limited social activities, sponsorships and donations.</p>	<p>All sponsorships, donations, social contributions and activities are carefully planned, approved and monitored by ASEE Group Marketing or Sales.</p> <p>Annual Plan and Budget for contributions to the local communities. ASEE Group Marketing collect proposals, review them and approves funds for their realization.</p>
<p>Anti- Corruption</p> <p>Risk of malpractice and misconduct.</p> <p>Risk of offering and receiving bribes, gifts and hospitalities could lead to potential regulatory sanctions and damaged reputation.</p>	<p>Established Code of Ethics, Anti-Corruption, Conflict of Interests and Fair Competition Policy where it is clearly defined control mechanisms for prevention of corruption, conflict of interest or any unethical behavior and misconduct.</p> <p>In 2022, it is planned to enhance Anti-Corruption control environment through introduction of Whistleblowing Program.</p>
<p>Privacy protection</p> <p>Risk of failure to provide personal data protection and security (data leakage and/or</p>	<p>Comply with higher GDPR standards and appointment of Data Protection Officer in majority of ASEE subsidiaries.</p>



<p>unauthorized data use) may lead to potential regulatory sanctions and penalties, as well as loss of reputation and client trust.</p>	<p>Recognising the need to ensure compliance with GDPR the Management Board of Asseco South Eastern Europe SA on 25th of February 2021 adopted the Resolution no.1 on appointment of the company's Data Protection Officer. At the moment the issues of personal data protection, also including binding group standards, are additionally supervised by Data Protection Officer who is an external high-level specialist in the scope of personal data protection.</p> <p>In 2021 the ASEE Management Board decided to create a new role aiming to improve data management i.e. Chief Information Security Officer. The CISO was appointed in 2021 and started to work for the ASEE Group on the 1<sup>st</sup> of January 2022. The Group CISO will enhance governance structure to improve information/data security. He will be supported by a team of local security officers, who will be appointed in 2022.</p> <p>Comply with highest ISO 27001 – Information security and ISO 27701 – privacy protection. Please refer to the certified Management Systems section 3.5 this Report.</p> <p>Encourage ASEE subsidiaries to certify their processes in accordance with Iso 27001 and 27701 in the following years.</p>
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# About the Report

## 8. About the Report

### Statement of the Asseco South Eastern Europe S.A. Group on non-financial information for 2021

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 1.1.2021 to 31.12.2021 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 second report of the non-financial information published by the Group.

### 8.1. RELEVANCE OF INFORMATION IN THE REPORT

Report specification

Date drawn up: 10.02.2022.

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 repeat its materiality assessment in 2021 by extending the participation of employees in the analysis. Employee survey conducted in 2021 highlighted that employees are very concerned with health and safety issues. This is understood during the Covid-19 pandemic. The company further reinforces its H&S practice, aiming to completely address the employees' concerns. 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
<b>Business model and corporate governance</b>	
III.1. The market and strategic development directions	Strategic risks are related to 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	Competitors may develop new, alternative and disruptive business model and technologies.
III.3. Supply chain	Key suppliers fail to deliver agreed quality and quantity of goods or services
III.4. Capital Group	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 slowdown of revenues.
III.8. Ethics	Risk are addressed in other segments employment issues, health and safety, anti-corruption, HR etc.
<b>V. Environmental issues</b>	
V.1. Climate change	Presented below in section VIII as an individual risk segment
V.2. 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.3. Waste	Risk of Poor Waste Management of municipal waste and electrical/electronic equipment that could lead to potential penalties.
<b>VI. Employee issues</b>	
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
	Risk of potential accidents outside of office space during working hours (working from home)
	Not providing comfortable working conditions for work from home - chairs, desks and adequate equipment (many people do not have appropriate working conditions at home).
	Risk of increased operational expenses for the operational costs for work from home (coverage of internet, electricity and other employees commodities)
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.
<b>VII. Social and corruption issues</b>	
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	VII.3.1. Risk of malpractice and misconduct.
	VII.3.2. Risk of offering and receiving bribes, gifts and hospitalities could lead to potential regulatory sanctions and damaged reputation.
	VII.3.3. Lack of equal awareness of the anti-corruption procedures and differences in approach to their implementation in day-to-day practice between local companies.
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.
<b>VIII. Climate crisis</b>	
VIII.1. Legal risk	Impose additional environmental and social taxes and/or carbon reduction regulations to decrease CO2 emissions
VIII.2. Operational risk	VIII.2.1. Lack of workforce due to mental and physical health issues caused by increased temperatures, allergies, air pollution etc.
	VIII.2.2. Risks of fire, floods, earthquakes and their impact on companies' operational assets (offices, Data centers, internet connections etc.) due to increase temperatures, rising sea levels, extreme weather conditions
	VIII 2.3. Lack of operational resources or increased prices of resources (PCs, servers, routers, and other equipment) due to changes in supply chain, production, prices and scarcity of input materials
VIII.3. Consumption of fuels and energy	VIII.3.1. Risk of significant increase of electricity prices and electricity consumption that may lead to increase of operational expenses
	VIII.3.2. Risk of significant increase of fuel prices and fuel consumption that may lead to increase of operational expenses
VIII.4. Reputational risk	Increased expectation and demand for climate actions by all relevant stakeholders (employees, clients, vendors, suppliers, shareholders, regulators)
VIII.5. Business risk	Global warming may result in reduced tourism traffic which may reduce demand for traditional payment methods with cash (ATMs) and credit cards (POSs) may reduce company revenues



# Tables of Compliance

## 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.	12	
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.	16	
G.3.2.	List and short characteristics of the identified social or environmental risks.	16	
G.4.1.	Indicate if the company has a formal Code of Ethics.	17	
G.4.5.	Number of reported potential breaches of the ethical standards.	17	
G.4.6.	Number of ethical training sessions, number of participants.	17	
E.2.1.	Total energy use in MWh presented according to the main sources of energy.	26	MWh used instead of GJ
E.2.2.	Percentage (%) of energy coming from renewable energy sources	26	
E.2.3.	Energy use per unit of product or revenues.	27	

E.5.1.	Weight of emitted greenhouse gases.	30	
E.5.3.	Greenhouse gases emissions per unit of product or revenues.	30	
E.6.1.	Total weight of waste divided into hazardous and other than hazardous.	32	
E.6.2.	Total weight of waste by management method.	32	
E.6.4.	Waste emissions per unit of product or revenues.	33	
S.1.1.	Value of state public aid (financial support and equivalents of subsidies).	42	
S.1.2.	Value of revenues coming from public sector contracts and their share in total revenues.	42	
S.2.1.	Number of employees by type of employment contract.	36	
S.2.2.	Number of employees hired in the reporting period,.	37	
S.2.3.	Number of employees leaving the company in the reporting period.	37	
S.2.9.	Ratio of average gross salary of women to average gross salary of men in particular employee groups.	37	
S.2.10.	Ratio of average remuneration of the management board members to the lowest salary paid by the company.	38	
S.2.15.	Information on non-salary benefits offered to employees.	38	
S.5.1.	Average number of training hours (or training days) per employee.	38	Estimated
S.10.1.	Business areas exposed to the risk of corruption.	45	
S.10.2.	Number of reported cases of suspected corruption.	45	
S.10.3.	Number of confirmed cases of corruption.	45	
S.12.2.	Administrative proceedings against the company.	46	
S.12.3.	Financial value of penalties for breaching laws and regulations on reliability and ethics in marketing communication.	46	
S.13.1.	Number of incidents linked of clients'/employees' personal data leakage or unauthorized use.	47	
S.13.2.	Administrative proceedings against the company.	47	
S.13.3.	Financial value of penalties for breaching laws and regulations on personal data protection.	47	



## 10. Approval for publication

This non-financial statement of the Asseco South Eastern Group for 2021 was approved for publication by the Management Board of Asseco South Eastern Europe on February 23, 2022.

Management Board:

Piotr Jeleński	The CEO
Miljan Mališ	Member of the Board
Michał Nitka	Member of the Board
Kostadin Slavkoski	Member of the Board

## 11. Appendices

### 11.1. APPENDIX 1 – LIST OF COMPANIES

1. Asseco South Eastern Europe S.A. - Poland
2. Payten Spółka z ograniczoną odpowiedzialnością Sp.k. - Poland
3. Payten sp. z o.o. - Poland
4. Asseco SEE doo BiH
5. BS Telecom Solutions d.o.o. Sarajevo (BiH)
6. Monri Group BiH
7. Payten doo BiH
8. ASEE Bulgaria
9. ASSECO SEE d.o.o. Croatia
10. IT SISTEMI-NOVE TEHNOLOGIJE d.o.o. Croatia
11. EVISION INFORMACIJSKI SUSTAVI d.o.o. Croatia
12. GASTROBIT-GRC GRUPA D.O.O. Croatia
13. Integrirani poslovnici sustavi d.o.o. Croatia
14. MONRI PAYMENTS d.o.o. Croatia
15. PAYTEN d.o.o. Croatia
16. Web Studio d.o.o. Croatia
17. Sonet Czechia
18. Sonet Slovakia
19. Asseco SEE Sh.p.k – Kosovo
20. Asseco SEE Sh.p.k - Albania
21. Asseco SEE Macedonia
22. Payten Macedonia
23. VEBSPOT DOOEL Skopje (Macedonia)
24. Payten Montenegro
25. E-MON Montenegro
26. NECOMPLUS, S.L. Spain
27. NECOMPLUS COLOMBIA SAS
28. NECOMPLUS SERVEIS ANDORRA
29. NECOMPLUS PERU SAC
30. NECOMPLUS PORTUGAL
31. NECOMPLUS Dominicana Srl
32. UTE 010 Valencia
33. Monri Colombia
34. Payten Egypt LLC
35. ASSECO SEE SRL (ROMANIA)
36. PAYTEN PAYMENT SOLUTIONS SRL Romania
37. ASSECO SEE SRL (Moldova)
38. ContentSpeed srl Romania
39. Payten d.o.o. Slovenia
40. ASEE Serbia
41. Chip Card Serbia
42. Payten Serbia
43. Things Solver doo Serbia
44. Asseco SEE Bilişim Teknolojileri A.Ş.
45. Mobven Teknoloji A.Ş. Turkey
46. Payten Teknoloji A.Ş. Turkey
47. NestPay Odeme Hizmetleri Turkey
48. Smarttek Yazılım Turkey

## 11.2. 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).