

Notification under art. 69 sec. 1 or 2 in conjunction with art. 87 sec. 1 point 2 or 2a or 2b of the Public Offering Act (completed by TFI ZASI or PTE)

1. Initial Notification / Change

- Initial Notification

2. Issuer Information

- LEI Code: 2594001MNJ3BH1UVVG70

- Issuer Name: Comarch S.A.

3. Notifying Party Information

- Representative for the submission of the notification and details of the principal as below:

Adam Pietrasik

- Principal's Information:

GENERALI OTWARTY FUNDUSZ EMERYTALNY (Open Pension Fund), Senatorska Street 18, Warsaw 00-082, Poland

LEI: 259400FE8XJX6HGT6D46

4. Managed Funds/Companies Information

- Entity: GENERALI OTWARTY FUNDUSZ EMERYTALNY, Senatorska Street 18, Warsaw 00-082, Poland

LEI: 259400FE8XJX6HGT6D46

5. Direct and Indirect Shareholding - Before the Change

a) Number of bearer and/or non-preferential registered shares: 829,183

b) Number of preferential registered shares: 0

c) Total number of shares: 829,183

d) % share of share capital: 5.48%

e) Number of votes: 829,183

f) % share of the votes: 5.48%

Senatorska Street 18, Warsaw 00-082, Poland

GENERALI DOBROWOLNY FUNDUSZ EMERYTALNY (VOLUNTARY PENSION FUND)

LEI: 2594002LZXU6D39K5L69

6. Direct and Indirect Shareholding - Before the Change

a) Number of bearer and/or non-preferential registered shares: 5,918

b) Number of preferential registered shares: 0

c) Total number of shares: 5,918

d) % share of share capital: 0.04%

e) Number of votes: 5,918

f) % share of the votes: 0.04%

7. Total Shareholding Before the Change

- a) Number of bearer and/or non-preferential registered shares: 835,101
- b) Number of preferential registered shares: 0
- c) Total number of shares: 835,101
- d) % share of share capital: 5.52%
- e) Number of votes: 835,101
- f) % share of the votes: 5.52%

8. Reason for Notification

Event Details:

Entity concerned: GENERALI OTWARTY FUNDUSZ EMERYTALNY (OPEN PENSION FUND)

Notification Date: 2024-10-15

Event Date: 2024-10-08

Transaction Settlement Date: 2024-10-11

Date of receiving information about the event: 2024-10-14

Event type: Sale – regulated market or ASO

Description of the event: Response to a tender offer for Comarch S.A.

9. Direct Shareholding Before and After the Change

Before the Change:

- a) Number of bearer and/or non-preferential registered shares: 829,183
- b) Number of preferential registered shares: 0
- c) Total number of shares: 829,183
- d) % share of share capital: 5.48%
- e) Number of votes: 829,183
- f) % share of the votes: 5.48%

After the Change:

- a) Number of bearer and/or non-preferential registered shares: 0
- b) Number of preferential registered shares: 0
- c) Total number of shares: 0
- d) % of share capital: 0%
- e) Number of votes: 0
- f) % share of the votes: 0%

10. Shareholding under art. 69b of the Public Offering Act

Not applicable.

11. Total holdings of the obligated entity and funds/companies

Total holdings

- a) Number of bearer and/or non-preferential registered shares: 0
- b) Number of preferential registered shares: 0
- c) Total number of shares: 0
- d) % share of share capital: 0%
- e) Number of votes: 0
- f) % share of the votes: 0%