

Notification under art. 69 sec. 1 or of the Public Offering Act (completed by the shareholder)

1. Initial Notification / Change

- Initial Notification

2. Issuer Information

- LEI Code: 2594001MNJ3BH1UVVG70

- Issuer Name: Comarch S.A.

3. Notifying Party Information

- Type of entity:

natural person

legal person

- Name: Maria

- Surname: Filipiak

lack of PESEL number

Shares held indirectly by subsidiaries

Shares held directly

4. Direct Shareholding - Before the Change

a) Number of bearer and/or non-preferential registered shares: 368,008

b) Number of preferential registered shares: 297,666

c) Total number of shares: 665,674

d) % share of share capital: 8.18%

e) Number of votes: 1,856,338

f) % share of the votes: 12.27%

5. Data of the Shareholder's Subsidiaries

- Address of registered office: Zabłocie Street 25/35

- Postal code: 30-701

- City: Cracow

- Country: Poland

- Name of subsidiary: SATYA FUNDACJA RODZINNA W ORGANIZACJI

- LEI code: 259400QEUDJOQ7GGCZ75

lack of LEI code

6. Direct Shareholding - Before 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) % share of share capital: 0%
- e) Number of votes: 0
- f) % share of the votes: 0%

7. Total Shareholding Before the Change

- a) Number of bearer and/or non-preferential registered shares: 368,008
- b) Number of preferential registered shares: 297,666
- c) Total number of shares: 665,674
- d) % share of share capital: 8.18%
- e) Number of votes: 1,856,338
- f) % share of the votes: 12.27%

8. Reason for Notification

Event Details:

- Entity concerned: Filipiak Maria
- Notification Date: 2024-11-04
- Event Date: 2024-11-04
- Transaction Settlement Date: 2024-11-04
- Date of receiving information about the event: 2024-11-04
- Event type: Donation
- Description of the event:

Based on Article 69 section 1 point 2, in conjunction with Article 69, section 2 point 1 letter a) of the Act of the 29th of July, 2005 on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies (the "Public Offering Act"), Maria Filipiak (the "Notifier") hereby notifies of a change in the Notifier's direct share in the total voting rights in Comarch S.A. in Krakow (the "Company"), due to the donation of a portion of shares directly held by the Notifier to an affiliated entity as per the Public Offering Act.

On the 31st of October, 2024, donation agreements (the "Donation Agreements") were signed between Maria Filipiak (the "Donor") and Satya Fundacja Rodzinna w organizacji (Family Foundation in organization), based in Krakow (the "Donee", "Satya F.F. in Organisation", "Subsidiary"). The transaction was settled on the 4th of November, 2024.

As a result of the conclusion and settlement of the Donation Agreements, the Donor transferred to the Donee 368,008 dematerialised ordinary bearer shares of the Company, representing 4.52% of the Company's share capital and entitling the holder to exercise 368,008 votes, which constitutes 2.43% of the total voting rights at the Company's general meeting. Consequently, this transfer reduced Maria Filipiak's direct holding to below 10% of the total voting rights.

Following the transaction, the Donee acquired 368,008 dematerialised ordinary bearer shares of the Company, maintaining the same 4.52% share capital representation and 2.43% voting rights share at the Company's general meeting.

The acquisition by the Subsidiary of direct ownership of the shares did not affect the total number of shares directly or indirectly held by the Notifier. Post-acquisition, the Notifier holds a total of 665,674 shares in the Company, entitling the holder to exercise 1,856,338 votes, which represents 8.18% of the share capital and 12.27% of the total voting rights, broken down as follows:

(a) 297,666 registered shares with preferential voting rights (each entitled to five votes), representing 3.66% of the share capital and 9.84% of the total voting rights in the Company, held directly by the Notifying Party; and

(b) 368,008 ordinary bearer shares entitling the holder to 368,008 votes, representing 4.52% of the share capital and 2.43% of the total voting rights, held indirectly by the Notifier (i.e., via the Subsidiary).

Pursuant to Article 87 section 5 of the Public Offering Act, the voting rights held by the Subsidiary are included in the voting rights of the Notifier.

Satya F.F. in Organisation is a subsidiary of the Notifier, and no other subsidiaries of Satya F.F. hold shares in the Company. Apart from the Subsidiary, there are no other subsidiaries of the Notifier that hold shares in the Company.

Neither the Notifier nor Satya F.F. in Organisation have any relationship with another entity as outlined in Article 69 section 4 point 6 of the Public Offering Act.

Furthermore, neither the Notifier nor the Subsidiary holds any financial instruments as described in Article 69b section 1 point 1 or 2 of the Public Offering Act

9. Direct Shareholding Before and After the Change

Before the Change:

- a) Number of bearer and/or non-preferential registered shares: 368,008
- b) Number of preferential registered shares: 297,666
- c) Total number of shares: 665,674
- d) % share of share capital: 8.18%
- e) Number of votes: 1,856,338
- f) % share of the votes: 12.27%

After the Change:

- a) Number of bearer and/or non-preferential registered shares: 0
- b) Number of preferential registered shares: 297,666
- c) Total number of shares: 297,666
- d) % share of share capital: 3,66%
- e) Number of votes: 1,488,330
- f) % share of the votes: 9,84%

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

- Not applicable
- Applicable

11. Total (Direct and Indirect) and Current Shareholding Before and After the Change

- Total and current shareholding is not the same

Total holdings

- a) Number of bearer and/or non-preferential registered shares: 368,008
- b) Number of preferential registered shares: 297,666

- c) Total number of shares: 665,674
- d) % share of share capital: 8.18%
- e) Number of votes: 1,856,338
- f) % share of the votes: 12.27%