Sustainability Report of the Benefit Systems Group for 2024

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Letter from the Management Board

Dear Readers,

We are pleased to present the Sustainability Report of the Benefit Systems Group (this "Report") – a comprehensive overview of our activities in the areas of environmental sustainability, social responsibility, and governance. This Report introduces new data, metrics and indicators, and an updated reporting standard. However, our mission remains unchanged: to provide services in Poland and abroad that help people of all ages achieve a sense of satisfaction, fulfilment, and a high quality of life. Our offering supports the physical health and mental well-being of employees across several European countries. The MultiSport card provides access to thousands of sports and fitness facilities, the MultiLife programme delivers innovative well-being solutions, and the MyBenefit cafeteria is a flexible tool for creating tailored employee benefits and managing organisational rewards. Our extensive network of modern fitness clubs operates in both domestic and international markets.

Each year, we expand and enhance our offering by increasing access to sports and recreational facilities, developing well-being services, and investing in state-of-the-art technologies. We support our clients in building comprehensive strategies to enhance employee well-being within their organisations. Through the MultiSport Foundation, we promote physical activity among children, young people, seniors, and individuals with disabilities, further strengthening Benefit Systems' positive social impact.

Our mission remains as relevant as ever. According to the MultiSport Index 2024, one in three Poles does not engage in any physical activity. Unfortunately, this aspect continues to be overlooked in everyday priorities. At Benefit Systems, we recognise this as a challenge – one that calls for mobilising the public and reshaping perceptions of the importance of an active lifestyle.

At Benefit Systems, we believe that not only what we do matters, but also how we do it. As a longstanding member of the B Corp movement, we adhere to a collaboration model that is both ethical and partnership-driven, in full alignment with international standards and best practices for stakeholder engagement.

In 2024, we continued to deliver on our ESG commitments. Our perspective and understanding of sustainability matters have been further expanded through the double materiality assessment we conducted. This assessment forms part of a broader process – reporting in accordance with the new requirements introduced by the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). This year marks the first time that Benefit Systems Group is reporting in compliance with these standards. We approach this challenge with full commitment, firmly believing that transparency and accountability are fundamental to building trust and ensuring long-term sustainable growth.

We invite you to explore our 2024 Sustainability Report. We trust that the data and initiatives presented here reflect our unwavering commitment to our mission and our dedication to creating a better future for all.

Management Board of Benefit Systems S.A.

01. General information

To ensure transparency and clarity in this report, the following key terms and abbreviations used throughout the document are defined below:

- **Benefit Systems Group –** hereinafter referred to as the "Group" or "Benefit Systems Group", comprising Benefit Systems S.A. and its subsidiaries.
- **Benefit Systems S.A. –** hereinafter referred to as the "Company", "BSSA", "Parent", acting as the parent company of Benefit Systems Group.
- **Benefit Systems Fitness Branch of Warsaw –** hereinafter referred to as "Fitness Branch", a division of Benefit Systems S.A. responsible for managing operations related to the Group's owned sports and fitness facilities.
- **associates –** non-employees who are part of the Group's own workforce and collaborate under alternative forms of engagement.

BP-1

General basis for preparation of the sustainability statement

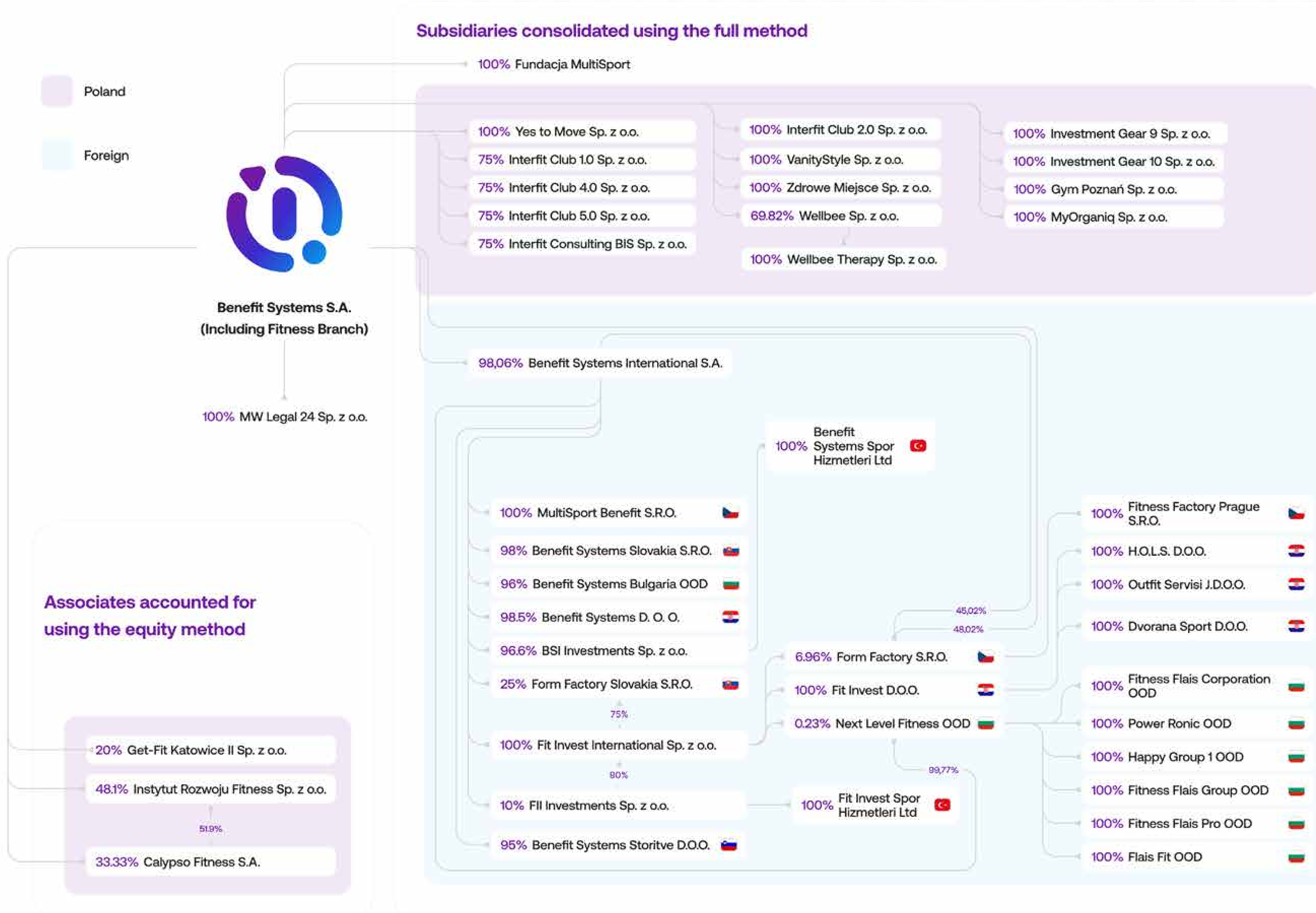
The sustainability statement has been prepared for the period 1 January to 31 December 2024 on a consolidated basis for the Benefit Systems Group, and it forms part of the Directors' Report. The statement has been developed in accordance with applicable regulations, particularly the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), as well as the national legislation implementing the CSRD Directive into Polish law, namely the Act of 6 December 2024 Amending the Accounting Act, the Act on Statutory Auditors, Audit Firms, and Public Oversight, and Certain Other Acts.

This report covers the period 1 January to 31 December 2024 and has been prepared on a consolidated basis, with the scope of consolidation aligned with that of the Group's consolidated financial statements.

The subsidiaries included in the Group's consolidation scope operate under a homogeneous business model, primarily focusing on the provision of non-pay employee benefits in the areas of sports and recreation. Their core offering includes sport cards granting access to a network of sports and fitness facilities, including the Group's own fitness clubs. The Group does not disclose information on social, environmental, or governance matters for three associated companies, due to its minority interest and lack of operational control over them: Get-Fit Katowice II Sp. z o.o., Instytut Rozwoju Fitness Sp. z o.o., and Calypso Fitness S.A.

On 19 April 2024, the Company entered into agreements with the shareholders of SmartLunch S.A., covering, among other matters, the sale of 100% of the shares in its subsidiary Lunching.pl Sp. z o.o. As a result, on 20 November 2024, the Company lost control over Lunching.pl Sp. z o.o. to SmartLunch S.A. and became the owner of 19.15% of the shares in SmartLunch S.A., which is not part of the Benefit Systems Group. Disclosures on the Group's environmental metrics (with the exception of the carbon footprint) do not include data from Lunching.pl Sp. z o.o. or the MultiSport Foundation. On 19 November 2024, the Company acquired a 69.8% interest in Wellbee Sp. z o.o., which holds 100% of the shares in Wellbee Therapy Sp. z o.o., thereby obtaining control over both companies as of that date. This Report does not include data on Wellbee Sp. z o.o. and Wellbee Therapy Sp. z o.o. The report also excludes data for Fit Invest D.O.O. as well as H.O.L.S. D.O.O. in terms of employment metrics at 31.12.2024 due to the ongoing consolidation process. These data do not materially affect the Group's reporting.

The Group structure on 31.12.2024:



The Group's value chain served as the basis for the double materiality assessment, which considered both the impact of the Group's operations on its suppliers and partners as well as their impact on the Group. A key step in the process was the assessment of the Group's impact on customers and end-users, and their impact on the organisation, which is an integral part of the downstream value chain

customers and end-users, and their impact on the organisation, which is an integral part of the downstream value chain. This report also encompasses the value chain in both upstream and downstream Scope 3 greenhouse gas emissions, as well as external stakeholders falling within the scope of: ESRS S2 Workers in the value chain, ESRS S3 Affected communities, and ESRS S4 Consumers and end-users.

The Group has used the option to omit specific information corresponding to intellectual property, know-how, or the results of innovation, as indicated in section S4. The Group has not applied the exemption from disclosure of impending developments or matters in the course of negotiation, as provided for in Articles 19a(3) and 29a(3) of Directive 2013/34/EU.

BP-2

Disclosures in relation to specific circumstances

The Group has applied the exemptions set out in Appendix C to ESRS 1 List of Phased-in Disclosure Requirements. These are:

- **E1-9** – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
- **E3-5** – Anticipated financial effects from water and marine resources-related impacts, risks and opportunities
- **E5-6** – Potential financial effects from resource use and circular economy-related risks and opportunities
- **SBM-3** paragraph 48(e) (anticipated financial effects) for the first year of preparation of its sustainability statement.

The statement discloses information in accordance with Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

The Group applies time horizon definitions consistent with ESRS standards, defining a period of up to 12 months as short-term, a period of 1 to 5 years as medium-term, and a period of more than 5 years as long-term.

This document represents the Group's first sustainability statement prepared in accordance with ESRS standards. Consequently, the Group has not disclosed any changes in the preparation or presentation of the ESG report, nor any prior-period errors.

This sustainability statement has been reviewed under an external assurance engagement, concluded with limited assurance. The assurance engagement was conducted by the audit firm KPMG Audyt Spółka z ograniczoną odpowiedzialnością sp. k.

For the purposes of the GHG emissions reporting process (section E1-6), the Group used metrics incorporating data from both direct internal sources (internal IT systems) and indirect sources for emissions estimation (including environmental databases and sources such as Ecoinvent, Exiobase, AIB, KOBIZE, and DEFRA). The analysis was based primarily on actual operational data, including energy consumption, the weight of purchased goods, and accounting records. Where data availability was limited, an extrapolation approach was applied, including for emissions from employee commuting (only 11% of the workforce participated in the survey), emissions from the business activities of foreign subsidiaries (partially based on source data and partially extrapolated using financial data), and indirect emissions related to the infrastructure and services provided by the Group.

The accuracy of reported emissions depends on the availability and quality of source data. Scope 1 and 2 emissions, as well as most Scope 3 categories, have been fully verified, with comprehensive input data coverage for key areas (such as purchased goods and services, capital goods, and business travel).

In cases where complete operational data was unavailable, estimates were made using measurement tools (for example, distance tracking for business travel and transport), and emission models (for example, a model of emissions from the use of products based on internal data). The level of uncertainty is particularly significant for emissions associated with infrastructure and services within the Group's business model, including the operation of sports and recreational facilities, where emissions were extrapolated based on energy consumption at the Group's own facilities. Similarly, emissions from transport and distribution related to the Group's purchases were estimated using average emission factors for different transport modes, making the results dependent on external databases and market variables.

To improve the accuracy of emissions calculations in the future, the Group plans to expand the scope of actual data collected from foreign subsidiaries, suppliers, and value chain partners, particularly for Scope 3 categories, where in-house estimation models are currently applied. In the coming years, the Group intends to implement more advanced data collection methods, including the automation of emissions reporting processes and a broader assessment of the impact of various energy sources on emission levels using the market-based approach.

Certain quantitative metrics and monetary amounts are subject to a high level of measurement uncertainty, particularly regarding indirect value chain emissions (with the greatest uncertainty in emissions derived from financial data). All estimations in this reporting process are based on the best available data and established methodologies, with ongoing efforts focused on systematically improving accuracy and completeness.

Cross-cutting disclosures included in this sustainability statement, as determined by the list of material reportable topics, have been presented in accordance with the corresponding ESRS 2 cross-cutting disclosure requirements.

Sustainability governance

GOV-1

The role of the administrative, management and supervisory bodies

The Benefit Systems Group is governed by the Management Board ("Management Board"), which operates in accordance with applicable laws, including the Commercial Companies Code, the Company's Articles of Association, resolutions of the General Meeting ("General Meeting"), resolutions of the Supervisory Board ("Supervisory Board"), and the Rules of Procedure for the Management Board. Under the Articles of Association, the Management Board is responsible for all matters related to the management of the Company, except for those reserved by law for the General Meeting or the Supervisory Board. The Management Board defines the Company's strategy and key business objectives for the next financial year and presents them to the Supervisory Board. It is also responsible for the implementation and execution of the strategy and key business objectives. The Audit Committee ("Audit Committee") monitors the sustainability reporting process, including the double materiality assessment and the assurance process conducted by the audit firm for sustainability reporting.

Composition of administrative, management, and supervisory bodies in the Parent as at the end of 2024

2
Number of Management Board members

6
Number of Supervisory Board members

3
Number of independent Supervisory Board members

0
Employee representatives on the Management Board and Supervisory Board

Female

3
Number of non-executive members

1
Number of executive members

50%
Percentage of women on the Management Board and Supervisory Board

Male

3
Number of non-executive members

1
Number of executive members

50%
Percentage of men on the Management Board and Supervisory Board

Other/not disclosed

0
Number of non-executive members

0
Number of executive members

In 2024, the Management Board comprised:

Marcin Fojudzki

Member of the Management Board

Appointed on 6 September 2023. He is responsible for financial management, investor relations, internal audit, risk management, compliance, mergers and acquisitions, corporate communication, ESG, legal affairs, and certain IT functions. Prior to joining the Group, he served as a Management Board member and Chief Financial Officer at Iglotex S.A. He previously held key leadership positions, including Director of Financial Controlling, General Manager of Eurocash Cash & Carry, and Deputy Chief Financial Officer of the Eurocash Group. Additionally, he was a Supervisory Board member at the Mar-Ol Group and Frisco.

He holds a degree in Finance and Banking from the Poznań University of Economics and Business, and a Capital Investments qualification from WSB University. He has completed the Kellogg-Católica Advanced Management Programme and holds an ACCA qualification.

Emilia Rogalewicz

Member of the Management Board

Appointed on 10 August 2017. She is responsible for sales strategy, product and service development, partner relations, customer service, and certain IT functions. She also oversees the HR and administration departments and the Fitness Branch. Before joining the Company in 2007, she worked in the insurance sector for two years. Since joining the Company, she has played a key role in building the partner network and developing the MultiSport card sales model. From 2009, she held managerial positions, leading sales teams and structuring the sales organisation nationwide. In 2013, as Sales Director, she was responsible for defining the Company's sales strategy and achieving sales targets. Following the integration of customer service and sales structures in 2016, she has been managing a team of over 200 employees. She holds a degree from the Faculty of Management at Częstochowa University of Technology and has completed postgraduate studies in Sales Team Management and Business Psychology for Managers at Kozminski University in Warsaw. She also completed the Matrik Trainer School, Negotiation School, and the Strategic Leadership Academy at ICAN Institute, as well as executive development programmes at INSEAD (France) and IMD (Switzerland).

The Supervisory Board is responsible for the ongoing supervision of the Group's operations across all areas of activity. Its key responsibilities include:

- assessing the consolidated Directors Report on the operations of the Group and the consolidated financial statements for each financial year,
- approving the Rules of Procedure for the Management Board,
- appointing and removing Management Board members and determining the terms of their service,
- selecting the audit firm responsible for auditing the financial statements,
- providing opinions on proposals submitted by the Management Board to the General Meeting.

The Supervisory Board operates in accordance with the Commercial Companies Code, the Company's Articles of Association, and the Rules of Procedure for the Supervisory Board. As at 31 December 2024, the Supervisory Board comprised:

James Van Bergh

Chair of the Supervisory Board

James Van Bergh graduated from Harvard Business School in 1985. In 1981–1990, he worked in Boston and London as a Consultant for Bain & Co. He later became a Director at the Task Force on Company Assistance, where he led a United Nations project aimed at supporting Polish state-owned enterprises in restructuring processes by collaborating with business experts from various countries. For the next four years, he continued his career in Poland as General Director at Company Assistance. From 1995 to 1997, he served as a Director at Trinity Management, a joint venture between Pekao S.A., BZW Barclays Bank, and Company Assistance Ltd. In 1997, he assumed the role of President of the Management Board of Trinity Management, a position he held for two years. In 2000–2003, he was President of E-Katalyst S.A. He continues to serve as a Director at Benefit Invest Ltd. In 2014, he founded Good&Well, a Canadian fund focused on investing in early-stage companies with embedded social impact objectives.

Krzysztof Kaczmarczyk

Deputy Chair of the Supervisory Board

From 1999 to 2008, he worked at Deutsche Bank in Poland, where he held various roles, including Deputy Director of the Equity Research Department and Equity Analyst for the Central and Eastern Europe region. Between 2008 and 2010, he held senior management positions at the TP Group, including Director of Strategy and Development. From 2010 to 2011, he worked at Credit Suisse in Poland. From 2012 to 2015, he served as Vice President of the Management Board for Strategy and Development at Emitel, a leading operator of terrestrial radio and television networks in Poland. Between 2016 and 2019, he was an Advisor to the Management Board of KGHM Polska Miedź S.A. Since 2021, he has served as President of the Management Board of Mabion S.A., a biotechnology company listed on the Warsaw Stock Exchange.

He has over 15 years of supervisory experience, having served on the Supervisory Boards of more than 30 companies listed on the Warsaw Stock Exchange, including Action, Alta, APS Energia, Arteria, Braster, Best, BSC Drukarnia, Celon Pharma, Elektrotim, Enter Air, EnelMed, Duon, the Warsaw Stock Exchange, Graal, Huuuge Games, Integer, InPost, KGHM, Develia, Magellan, Mabion, Polimex-Mostostal, Polish Energy Partners, Robyg, SARE, TIM, Wirtualna Polska, Work Service, VIGO, and 4fun Media. He qualifies as an independent member under capital market regulations and the Act on Statutory Auditors.

Aniela Anna Hejnowska

Member of the Supervisory Board

In 2020, she assumed the role of General Manager at IQVIA, a global leader in healthcare consulting, research, technology, and data analytics. Previously, she served as Chief Operating Officer and Management Board member at Microsoft Poland. She has over 15 years of experience in managing organisations in the telecommunications and new technology sectors. At Microsoft, she was responsible for digitalisation strategies supporting the development of a data centre for the CEE region in Poland. In 2009, she held the position of Managing Director for SOHO/SME and Home markets at Netia. In 2012, she was appointed Managing Director of Groupon Poland, and after four years, she was promoted to an international role. From there, she spent three years as International Vice President at Groupon, overseeing a 450-person team across four markets. She specialises in strategic, process, and organisational culture transformations. In addition to her corporate experience, she is an entrepreneur and co-founder of Renters.pl, a company that grew to 80 employees and generated over PLN 100 million in revenue within four years. The company was later acquired by Enterprise Investors.

Julita Jabłkowska

Member of the Supervisory Board

She is a strategic adviser, mentor, and executive coach with over 25 years of professional experience. She specialises in business transformation, supporting companies in developing and implementing vision and strategy, as well as in creating cohesive business models and governance frameworks. A significant part of her career was spent at KPMG, in the Business Consulting division, where she focused on strategic advisory and corporate restructuring. Since 2021, she has served as President of the Management Board and co-owner of Grupa ALT, a consulting firm. She has led strategic and development projects for organisations including LUX MED Group, AGORA Group, Dealz Polska, OTL Group, PZU Group, PERN Group, Goldman Sachs TFI, Faurecia R&D Polska, CBOS, TV Puls, Huuuge Games, Arup Polska, PAYBAC, PEKAES, Castorama, Tauron Group, Poczta Polska, and the Polish Humanitarian Action (PAH). She holds a degree in Economics from the University of Warsaw, specialising in Finance and Banking, and has completed postgraduate studies in Professional Coaching – Methods and Practice at Kozminski University.

Katarzyna Kazior

Member of the Supervisory Board

She is a mentor and adviser to Private Equity funds, Last Mile Experts, and private companies. From 2015 to 2018, she served as President of the Management Board of Frisco.pl, Poland's largest online supermarket, where she led the company to significantly increase revenue, enhance profitability, and establish itself as a market leader. Between 2018 and 2019, she was Director of Digital Transformation at Żabka Polska, where she was responsible for key initiatives, including the development and implementation of the Żappka mobile app, the Store of the Future project, and internal AI-driven initiatives optimising business processes and decision-making. She began her career at McKinsey & Company, a leading global strategic consulting firm. In addition to her corporate experience, Katarzyna Kazior is an entrepreneur. She co-founded ClubCodes.pl, which was acquired by the French group Edenred in 2014. In 2012, as part of Rocket Internet, she co-founded Global Savings Group (then operating under the Cuponation brand) and was responsible for establishing the company's operations in Poland. She is a graduate of the London School of Economics and the Warsaw School of Economics, where she completed the CEMS Masters in Management international programme. She has also completed education at Harvard Business School.

Michael Sanderson

Member of the Supervisory Board

He holds a master's degree in Management from the Wharton School in Philadelphia. He began his professional career at Bain & Co. in London, a consulting firm. He currently serves as a Director at Benefit Invest Ltd (formerly Company Assistance Ltd, Dublin). From 1995 to 1999, he served as Vice President of the Management Board at Trinity Management. Since 2011, he has also been a mindfulness coach.

The Benefit Systems Group has established **a sustainability governance system.** Responsibility for the ESG strategy and its implementation rests with the Management Board of the Parent. In accordance with the Articles of Association of the Parent, Management Board members are required to perform their duties in a manner that considers the Company's long-term objectives and the interests of its stakeholders. Article 19 of the Articles of Association sets out the key considerations the Management Board takes into account when making decisions:

Management Board members perform their duties in a manner that aligns with the Company's objectives, considering the following factors:

- the likely consequences of any Management Board decision for the Company and its shareholders, including in the long term,
- the interests of employees and associates, including suppliers,
- the need to maintain positive business relationships, including with suppliers and customers,
- the impact of the Company's operations on society, particularly on local communities,
- the Company's environmental impact,
- the impact of the Company's activities on other stakeholders not explicitly referenced in this section,
- the Company's commitment to upholding and maintaining a reputation for adhering to high business conduct standards. Collectively, these are referred to as "Stakeholder Interests", with each individually referred to as a "Stakeholder Interest".

When performing the duty specified in item 4 above, a Management Board member must not assign greater or lesser weight to any specific Stakeholder Interest or group of Stakeholder Interests over others.

A Management Board member's pursuit of the Company's objectives and compliance with the obligations set out in item 4 constitute actions in the best interest of the Company.

These regulations form the foundation of the Benefit Systems Group's approach to ESG management and corporate responsibility.

In 2024, the ESG Committee was established as an advisory and consultative body supporting the Management Board.

The Chair of the ESG Committee is Marcin Fojudzki (Management Board member responsible for ESG), with Tomasz Półgrabski (Head of ESG and Public Affairs) serving as Deputy Chair. The ESG Committee is composed of senior management representatives, including Director of the HR and Administration Department, Director of the Legal Department, Deputy Director of the Internal Audit Department, Compliance Officer, Chief Financial Officer of the Fitness Branch, Director of Operations Management for the Fitness Branch, Director of Partner Relations, representative of Benefit Systems International, Risk Management Manager. As an advisory and consultative body, the ESG Committee supports the Management Board in overseeing ESG matters within the organization. The Head of ESG and Public Affairs is responsible for coordinating the Committee's activities and managing internal ESG communications.

The Audit Committee ("Audit Committee") monitors the sustainability reporting process, including the double materiality assessment and the assurance process conducted by the audit firm for sustainability reporting.

The ESG function is led by the Head of ESG and Public Affairs, who reports to the Management Board member responsible for Finance. The Head of ESG and Public Affairs is responsible for coordinating the implementation of the ESG strategy, identifying impacts, risks, and opportunities within the double materiality assessment, and overseeing sustainability reporting. This role also reports consolidated ESG-related information to the Management Board and the Supervisory Board, ensuring effective oversight and the integration of ESG considerations into the overall strategy. At the Parent level, the Head of ESG and Public Affairs is responsible for coordinating the preparation and monitoring of the ESG strategy's implementation. The strategy's objectives and performance measurement framework have been established in collaboration with business owners across various functional areas. These objectives are aligned with the role and business function of each area and focus on supporting internal and external stakeholders, advancing climate and environmental initiatives, and ensuring responsible business conduct. Business owners are accountable for delivering ESG objectives, while the Head of ESG and Public Affairs monitors progress against strategic targets. The status of these objectives is reviewed by the ESG Committee and subsequently approved by the Management Board. The Rules of Procedure for the ESG Committee require a minimum of three meetings per year. The ESG strategy objectives will be updated annually, following the completion of an ESG report and an assessment of regulatory gaps and double materiality assessment results.

In 2024, the first double materiality assessment was conducted in accordance with ESRS standards under the CSRD directive. The results were approved by the Management Board and will serve as the basis for reviewing and updating the strategic objectives of the current ESG strategy, as well as for selecting appropriate qualitative and quantitative metrics.

In the coming years, the Group aims to further structure the ESG goal-setting process and implement an approach that enables a more precise assessment of sustainability-related impacts.

Developing ESG competencies remains a key priority for the Group. In 2024, both the Management Board and the Supervisory Board participated in training on ESG reporting compliant with ESRS. Additional educational initiatives are planned for the coming years, along with collaboration with external advisers to enhance the qualifications of management and supervisory bodies and strengthen internal ESG knowledge and competencies across relevant departments, including the ESG department and other organisational units. In 2025, an assessment of available competencies will be conducted to identify areas requiring further development to more effectively integrate ESG considerations into key decision-making and operational processes.

In 2024, **the Group Risk Management Policy** was developed and approved, incorporating ESG-related risks, and a Risk Committee was established within the Company. The assessment of ESG risks and opportunities, which was an integral part of the double materiality assessment and serves as the foundation for ESG reporting, was reviewed alongside the methodology for integrating these factors into the existing risk management framework. The findings were presented at the Risk Committee meeting and subsequently discussed at the Management Board and Audit Committee meetings.

Requirements related to reporting lines to the Management Board and the Supervisory Board are detailed in section GOV-2, while dedicated controls and procedures for managing impacts, risks, and opportunities, including their integration with other internal functions, are outlined in section GOV-5.

GOV-2

Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The Head of ESG and Public Affairs is responsible for reporting aggregated sustainability-related information to the Management Board and the Supervisory Board, as well as information on ESG reporting and assurance process to the Audit Committee. In 2024, the Management Board was informed of key sustainability matters, including approval of the ESG strategy, initiation of the ESG reporting process, approval of the results of the double materiality assessment, and approval of the internal ESG Report Preparation Procedure and the Rules of Procedure for the ESG Committee.

The ESG Committee is primarily responsible for implementing and updating the Group's ESG strategy and for ensuring compliance with ESG-related regulations. The Committee held its first meeting on 2 December 2024, during which it reviewed the status of the ESG Strategy for 2024–2026.

In accordance with its Rules of Procedure, the ESG Committee addresses the following:

- monitoring compliance with applicable local and EU regulations, as well as relevant ESG standards and guidelines within the Group,
- monitoring the implementation of the Group's ESG strategy, with a focus on adopted metrics, established targets, and assigned responsibilities,
- consulting on the scope of ESG-related legal and regulatory requirements and proposed implementation solutions,
- developing recommendations for proposed actions and initiatives to enhance ESG management within the Group,
- consulting on initiatives to foster an ESG culture and awareness among employees,
- developing recommendations and guidelines for strategic ESG documents, including ESG policies,
- developing recommendations for ESG-related educational initiatives across the Group,
- overseeing and monitoring plans and actions related to the preparation of the Group's annual ESG report.

In accordance with its Rules of Procedure, the ESG Committee will convene at least three times per year. Additionally, regular working meetings between the Management Board member responsible for ESG and the Head of ESG and Public Affairs will be held at least once every two weeks. The Management Board will receive regular updates on ESG activities through minutes from ESG Committee meetings, ensuring ongoing monitoring of progress toward sustainability and ESG reporting objectives. In 2025, the Group plans to develop and adopt a formalised procedure and framework for reporting sustainability-related matters by the Head of ESG and Public Affairs to the Management Board and Supervisory Board.

The Audit Committee is responsible for coordinating the Supervisory Board's oversight of the sustainability reporting process. In line with the requirements of the Act on Statutory Auditors, the Audit Committee's responsibilities regarding sustainability reporting include:

- monitoring the ESG reporting process and identifying ESRS-compliant information – the double materiality assessment,
- monitoring the effectiveness of internal control, risk management, and internal audit systems to the extent relating to sustainability reporting,
- monitoring the financial audit process, particularly the assurance of sustainability reporting conducted by the audit firm.

In relation to the 2024 reporting, the Audit Committee's work included:

- reviewing the new responsibilities of the Audit Committee concerning sustainability (ESG) reporting,
- summarising the selection process for the audit firm responsible for the assurance of sustainability reporting for 2024–2025 and granting approval for the provision of ESG assurance services for this period,
- providing an update on the financial reporting process (organisation of the internal control process and system in the area of ESG reporting (ESG Reporting Procedure), implementation of a reporting tool, collaboration with an external advisor, and the establishment of the ESG Committee),

- providing an update on the assurance process for the 2024 ESG Report,
- approving the material topics selected by the Management Board, which were identified based on the Benefit Systems Group's double materiality assessment and serve as the basis for 2024 reporting in accordance with ESRS,
- summarising the 2024 sustainability reporting process and key findings,
- summarising the process and results of the assurance engagement for the 2024 ESG Report.

Details of the identified material topics are provided in section SBM-3.

In May 2024, **a Risk Committee** was established within the Company. Its primary objective is to support the Management Board and oversee the execution of risk management and business continuity tasks defined and implemented within the Company. The Risk Committee is responsible for developing solutions and issuing recommendations related to the implementation, maintenance, and improvement of the risk management system and the business continuity management system. The Committee meets at least three times per year.

In 2024, the Risk Committee held three meetings, focusing on risk management, including ESG-related risks. The key topics discussed included:

- approval of risk assessment results,
- development of recommendations for risk mitigation measures,
- approval of risk response plans,
- review of risk materialisation cases (for example, security incidents or breaches) and risk indicators,
- discussion of the double materiality analysis findings on risks and opportunities, including methodology for integrating risks and opportunities into the risk management system, and development of recommendations for risk and opportunity management.

The Committee's recommendations and key conclusions were submitted to the Management Board and subsequently presented to the Audit Committee.

In 2025, the Group plans to establish and standardise the approach by which the Management Board and the Supervisory Board incorporate impacts, risks, and opportunities in overseeing the ESG strategy, major transactions, and risk management processes. This aspect was not formally regulated within the Group in 2024. However, in 2024, the Company monitored and analysed ESG-related risks, which align with the material topics identified in the double materiality assessment. These include equal treatment and opportunities for all, working conditions, health and safety, privacy (covering both own workforce and external stakeholders), anti-corruption and anti-bribery.

ESG-related risks and opportunities have been integrated into the Company's existing risk management system and will be reported as part of management information, which is periodically submitted to the Risk Committee and the Management Board to ensure their inclusion in business decision-making processes. In 2024, the Group did not have a formal mechanism for the Supervisory Board to monitor the Management Board's actions regarding ESG management. The implementation of such a mechanism is planned for 2025.

GOV-3

Integration of sustainability-related performance in incentive schemes

The remuneration policy for members of the Management Board and Supervisory Board of Benefit Systems S.A. (the "Parent" or "Company") is set out in the Remuneration Policy for Members of the Management Board and Supervisory Board of Benefit Systems S.A., adopted by Resolution No. 24/10.06.2020 of the Annual General Meeting of 10 June 2020, and subsequently amended by Resolution No. 5/24.04.2024 of the Extraordinary General Meeting of 24 April 2024 (the "Remuneration Policy"). The Remuneration Policy is designed to attract, motivate, and retain qualified Management Board and Supervisory Board members, support the execution of the Company's business strategy and long-term objectives, and contribute to its stability, sustainable development, and continuous value growth. The remuneration system for Management Board members comprises both fixed and variable components, including annual bonuses and remuneration in the form of financial instruments.

The variable remuneration component is linked to the achievement of financial performance targets as well as specific non-financial objectives. As part of the Remuneration Policy and the Benefit Systems Group ESG Strategy for 2024–2026 (the "Strategy"), the promotion and implementation of ESG standards within the Company's internal environment and operational activities, and achieving a defined percentage score in the Pulse Check survey, which measures employee well-being at Benefit Systems, is one of the annual performance objectives for Management Board members that is subject to annual review by the Supervisory Board.

The Supervisory Board conducts an annual review to assess whether these objectives, including those defined in the ESG Strategy, have been met. Beyond the indicators mentioned above, the Company does not apply additional specific sustainability performance metrics.

The achievement of ESG-related objectives by a Management Board member is part of the overall assessment of non-financial performance, which influences variable remuneration as determined by the Supervisory Board. However, the portion of variable remuneration linked to sustainability performance is not quantified separately as a percentage relative to other objectives. Instead, the adopted non-financial targets serve as a benchmark for evaluating the Company's ESG efforts. Decisions regarding variable remuneration and its link to achieved results are made by the Supervisory Board, which conducts an annual review of strategic priorities and adjusts the incentive framework to reflect evolving stakeholder expectations and objectives. The remuneration system is continuously updated to ensure alignment with the Company's long-term goals and to effectively incentivise actions that support the sustainability strategy.

The Supervisory Board determines the specific remuneration terms for the Management Board on an annual basis. Supervisory Board members receive only fixed remuneration, as established by a resolution of the General Meeting.

GOV-4

Statement on due diligence

No formal human rights policy has been adopted at the Group level. However, in 2024, work commenced on the implementation of a due diligence policy called the Benefit Systems Group Responsible Business Conduct Policy, which is scheduled for adoption in 2025. The Group undertakes a range of measures to identify, assess, and manage actual and potential negative impacts on people and the environment, including in the context of human rights protection.

Core elements of due diligence	Paragraphs in the sustainability statement
Embedding due diligence in governance, strategy and business model	○ GOV-1 The role of the administrative, management and supervisory bodies ○ GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies ○ SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
Engaging with affected stakeholders in all key steps of the due diligence	○ IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities ○ SBM-2 Interests and views of stakeholders ○ S1-2 Processes for engaging with own workforce and workers' representatives about impacts ○ S2-2 Processes for engaging with value chain workers about impacts ○ S3 Affected communities – entity-specific disclosure ○ S4-2 Processes for engaging with consumers and end-users about impacts
Identifying and assessing adverse impacts	○ SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model ○ IRO-1 (along with E1 IRO-1, E3 IRO-1 and E5 IRO-1) Description of the processes to identify and assess material impacts, risks and opportunities
Taking actions to address those adverse impacts	○ E1-3 Actions and resources in relation to climate change policies ○ S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions ○ S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions
Tracking the effectiveness of these efforts and communicating	○ IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities – due diligence

GOV-5

Risk management and internal controls over sustainability reporting

The Group has implemented a risk management system based on recognised international standards and best market practices, including ISO 31000:2018 Risk management – Guidelines. The Group Risk Management Policy serves as the primary document outlining the core principles and framework for risk management.

Risk management is a continuous process comprising the following key elements: risk identification, analysis, and evaluation, risk response, monitoring, review, and communication, including developing a risk-aware organisational culture, documentation, and reporting.

The risk assessment process consists of multiple stages, guiding the organisation from identifying potential threats to determining appropriate risk response strategies. The key stages of risk assessment include:

- risk identification – identifying, discussing, and documenting internal and external events that, if materialised, could impact the achievement of business objectives,
- risk analysis – assessing the nature, level, and potential impact of risks, including its magnitude and scope. The outcome of the analysis determines the risk level, forming the basis for decisions on risk response measures aligned with the organisation's risk appetite,
- risk evaluation – assessing the materiality of risks, prioritising them, and determining the organisation's response strategy.

In May 2024, a Risk Committee was established within the Company. Its primary objective is to support the Management Board and oversee the implementation of risk management and business continuity processes defined and executed within the Company.

The Company systematically documents the risk management process, particularly the outcomes of each stage, including risk analyses, the risk register, and risk response plans. The risk register is updated at least once per year, with more frequent updates as needed. A summary of key risk factors and threats identified for the Group is published in the consolidated Directors' Report on the operations of the Benefit Systems Group.

In 2024, the Group conducted its first double materiality assessment in accordance with CSRD, identifying and assessing sustainability-related material risks and opportunities. These risks have been incorporated into the overall risk register and will be monitored and reported in line with the Company's established procedures.

The internal control system of the Parent is an integral part of the Group's risk management framework, supporting the achievement of corporate objectives and tasks while ensuring the accuracy and reliability of financial and sustainability reporting. The internal control system involves all business units and supporting functions. As part of the second line of defence, the internal control team supports first-line business functions and is responsible for structuring key control mechanisms and internal procedures. Independent assessments of these activities are conducted by the internal audit function (third line of defence).

Since 2024, the sustainability reporting process has been formally structured under the ESG Report Preparation Procedure, adopted by the Management Board. The Procedure defines the framework for preparing the sustainability report, including defining the reporting scope, data collection, analysis, and interpretation, preparation of qualitative and quantitative disclosures, review, approval, and publication of the ESG report, roles, responsibilities, and accountability of individuals involved in the ESG reporting process. The purpose of the Procedure is to ensure the timely delivery of a comprehensive, accurate, and reliable ESG report, fully compliant with regulatory requirements. Following the first ESG reporting cycle for 2024, recommendations from internal audit and internal control regarding identified gaps in the sustainability reporting process will be gradually implemented, along with recommendations from other areas, with reporting provided to the Management Board and the Supervisory Board as required.

A key risk in the sustainability reporting process concerns data collection from the value chain, given the large number of subsidiaries, partners, and suppliers across multiple countries. Additionally, risks include non-compliance with ESG regulations and sustainability principles in the broader market environment. At present, the Group does not have a formalised risk mitigation strategy for these issues available for disclosure. However, it plans to develop measures to address and mitigate these risks.

SBM-1

Strategy, business model and value chain

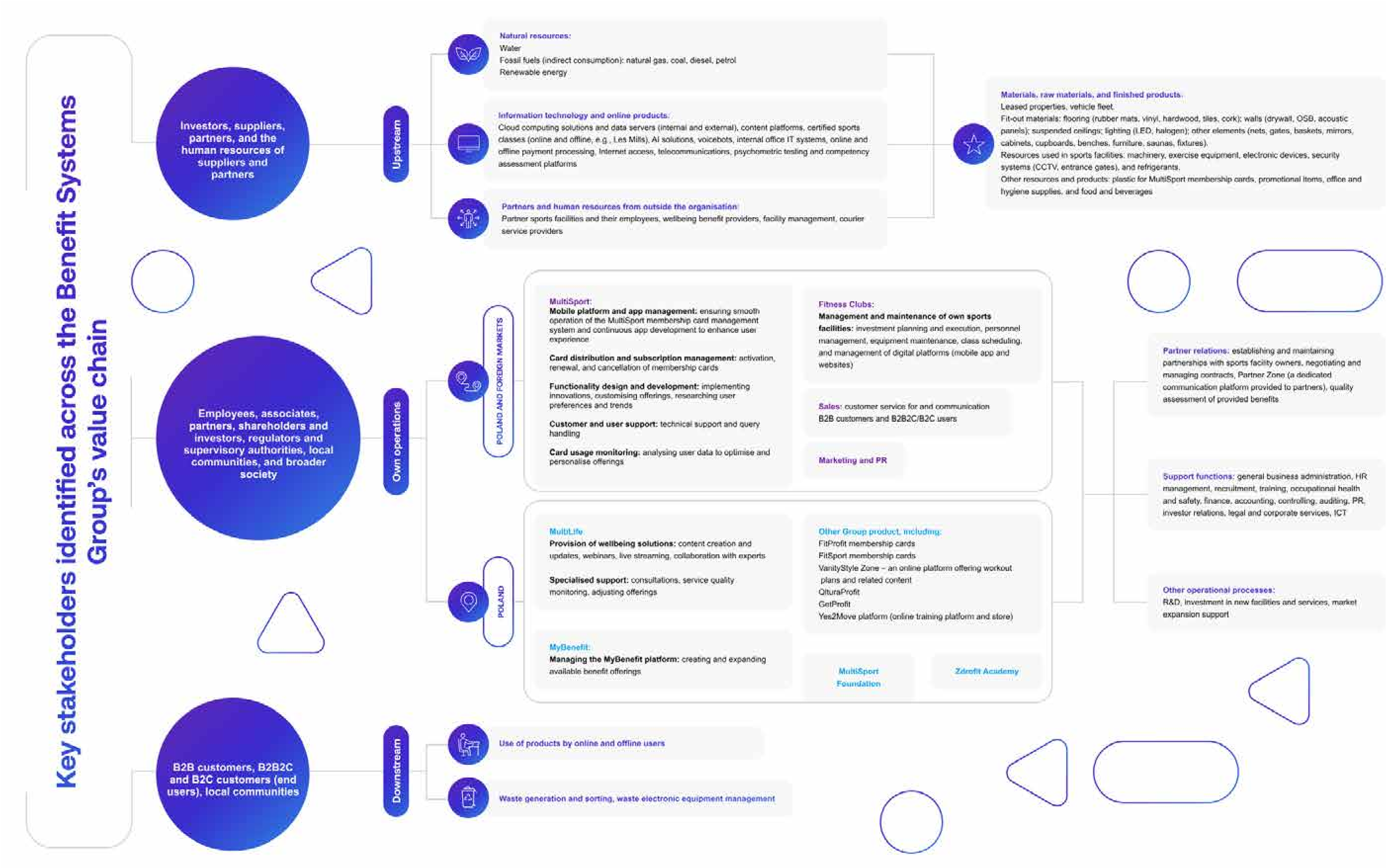
Country	Number of employees (headcount)
Poland	1240
Czech Republic	471
Slovakia	206
Bulgaria	321
Croatia	71
Turkey	128

The Benefit Systems Group delivers comprehensive solutions that promote an active and healthy lifestyle, integrating companies, employees, sports and fitness facilities, well-being services, and a cafeteria platform into a cohesive benefits ecosystem. The Group's business model is based on the provision of sports and recreational services and well-being solutions, which employers offer to their employees as part of their non-pay benefits strategies. A key component of the Group's operations is the provision of access to thousands of sports and fitness facilities through the MultiSport card and cooperation with an extensive network of external facilities that accept the card, as well as the management of the Group's own fitness club network, including the brands Zdrofit, Fabryka Formy, Fitness Academy, My Fitness Place, and FitFabric.

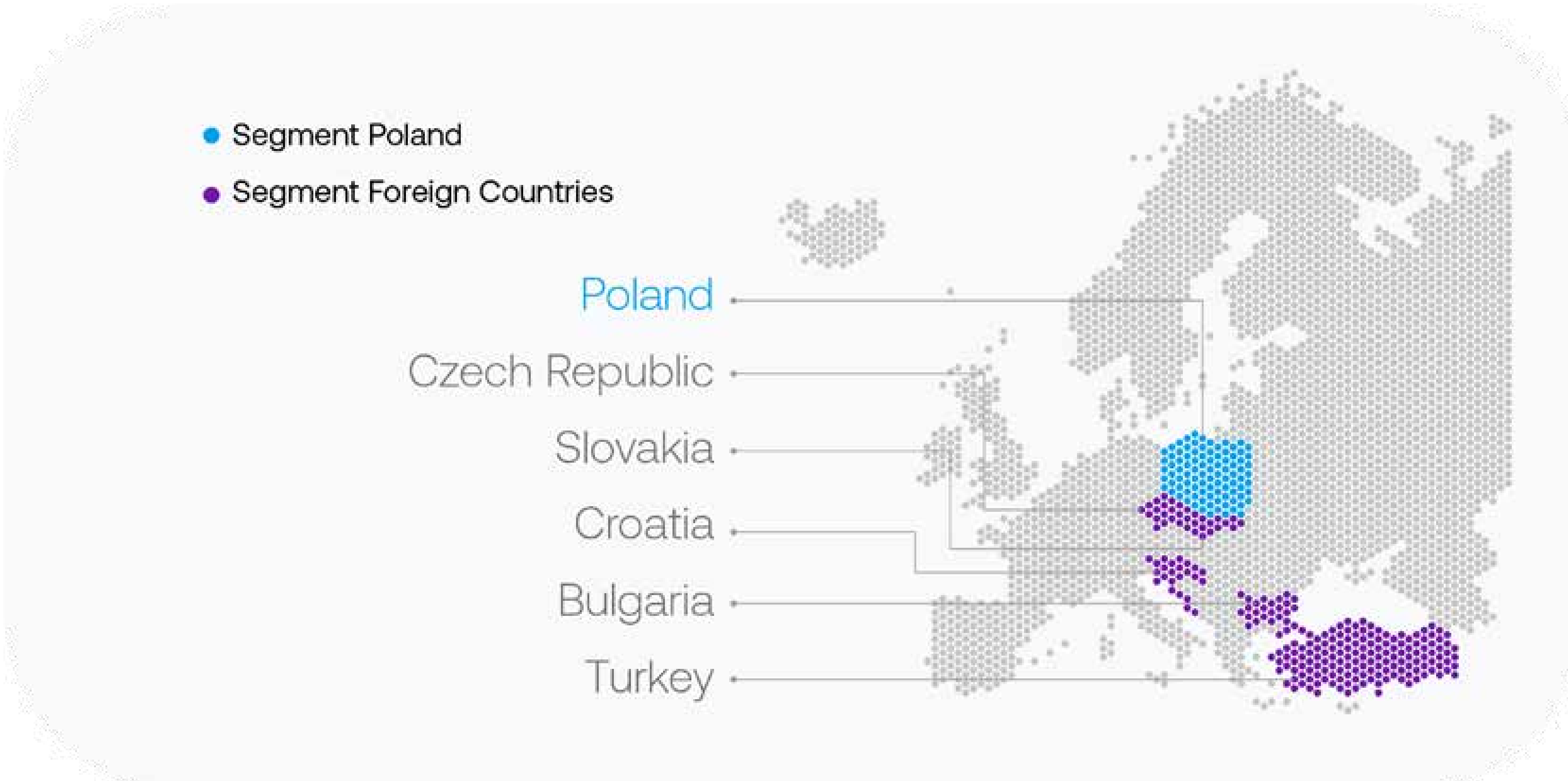
At the upstream level of the value chain are producers and suppliers of key resources (products and services), including as well as sports and fitness infrastructure necessary for the operation of fitness clubs. Collaboration with partners providing well-being services, mental health, nutrition, and personal development services, enables the expansion of the offering and enhances the value delivered to end-users. The development of digital tools also plays a key role, including those that support the development of the MyBenefit cafeteria programme and online applications and platforms that provide remote access to training programmes and consultations.

The Group's own operations include activities related to the development of products such as MultiSport, MultiLife, and MyBenefit, as well as the management of sports infrastructure (fitness clubs). These form the foundation of the Group's business model. MultiSport provides users with access to a broad network of sports and fitness facilities. The MultiLife programme focuses on supporting mental health, healthy nutrition, and personal development, and the MyBenefit cafeteria platform enables the flexible selection of non-pay benefits. At the same time, the Group engages in educational initiatives and competence development through the Zdrofit Academy, which trains fitness coaches and instructors, contributing to higher standards in the sports industry. The MultiSport Foundation promotes an active and healthy lifestyle, offering programmes for various social groups to reduce exclusion in this area.

At the downstream level of the value chain are B2B clients – companies implementing non-pay benefits programmes for their employees, B2B2C users – employees of those companies, and B2C users who purchase access to sports and fitness facilities directly. The distribution network includes both direct sales to companies and digital platforms enabling individual users to access services. Through the synergy between its proprietary products and sports and fitness facilities, external partners, and digital tools, the Group builds a sustainable value chain that supports both physical activity and overall well-being.


Key stakeholders identified across the Benefit Systems Group's value chain
Investors, suppliers, partners, and the human resources of suppliers and partners
Upstream
Natural resources:
Water
Fossil fuels (indirect consumption): natural gas, coal, diesel, petrol
Renewable energy
Information technology and online products:
Cloud computing solutions and data servers (internal and external), content platforms, certified sports classes (online and offline, e.g., Les Mills), AI solutions, voicebots, internal office IT systems, online and offline payment processing, Internet access, telecommunications, psychometric testing and competency assessment platforms
Partners and human resources from outside the organisation:
Partner sports facilities and their employees, wellbeing benefit providers, facility management, courier service providers
Materials, raw materials, and finished products.
Leased properties, vehicle fleet.
Fit-out materials: flooring (rubber mats, vinyl, hardwood, tiles, cork); walls (drywall, OSB, acoustic panels); suspended ceilings; lighting (LED, halogen); other elements (nets, gates, baskets, mirrors, cabinets, cupboards, benches, furniture, saunas, fixtures).
Resources used in sports facilities: machinery, exercise equipment, electronic devices, security systems (CCTV, entrance gates), and refrigerants.
Other resources and products: plastic for MultiSport membership cards, promotional items, office and hygiene supplies, and food and beverages
Employees, associates, partners, shareholders and investors, regulators and supervisory authorities, local communities, and broader society
Own operations
POLAND AND FOREIGN MARKETS
MultiSport:
Mobile platform and app management: ensuring smooth operation of the MultiSport membership card management system and continuous app development to enhance user experience
Card distribution and subscription management: activation, renewal, and cancellation of membership cards
Functionality design and development: implementing innovations, customising offerings, researching user preferences and trends
Customer and user support: technical support and query handling
Card usage monitoring: analysing user data to optimise and personalise offerings
Fitness Clubs:
Management and maintenance of own sports facilities: investment planning and execution, personnel management, equipment maintenance, class scheduling, and management of digital platforms (mobile app and websites)
Sales: customer service for and communication B2B customers and B2B2C/B2C users
Marketing and PR
POLAND
MultiLife
Provision of wellbeing solutions: content creation and updates, webinars, live streaming, collaboration with experts
Specialised support: consultations, service quality monitoring, adjusting offerings
MyBenefit:
Managing the MyBenefit platform: creating and expanding available benefit offerings
Other Group product, including:
FitProfit membership cards
FitSport membership cards
VanityStyle Zone – an online platform offering workout plans and related content
QlturaProfit
GetProfit
Yes2Move platform (online training platform and store)
MultiSport Foundation
Zdrofit Academy
Partner relations: establishing and maintaining partnerships with sports facility owners, negotiating and managing contracts, Partner Zone (a dedicated communication platform provided to partners), quality assessment of provided benefits
Support functions: general business administration, HR management, recruitment, training, occupational health and safety, finance, accounting, controlling, auditing, PR, investor relations, legal and corporate services, ICT
Other operational processes:
R&D, investment in new facilities and services, market expansion support
B2B customers, B2B2C and B2C customers (end users), local communities
Downstream
Use of products by online and offline users
Waste generation and sorting, waste electronic equipment management

Significant markets



Outside Poland, the Benefit Systems Group operates in the Czech Republic, Bulgaria, Slovakia, Croatia and Turkey.

The Group's key types of products and services include:

- **The MultiSport card and the Group's network of fitness clubs** constitute core infrastructure and a source of competitive advantage. MultiSport is the most comprehensive sport card offering on the market, providing access to thousands of sports and fitness facilities. The product supports employers in promoting employee health and well-being, while fostering their overall welfare. The MultiSport card contributes to increased employee engagement and reduced costs associated with sickness-related absences. It enables access to professional services and sports infrastructure, promoting a healthy and active lifestyle. In addition, it fosters the development of local communities united around shared goals and sporting values.
- In addition to corporate employees, who represent the primary user group of the MultiSport card (B2B2C), the Group's fitness clubs are also used by B2C users –individual customers who purchase passes or pay for single-entry access.
- **The MyBenefit online cafeteria platform,** which also serves as a key distribution channel for the Group's sport cards, supports employers' HR processes by enabling access to non-pay benefits through a single interface. It offers a wide range of benefits and a flexible financing model, including funding from the Company Social Benefits Fund (ZFŚS). Users select preferred benefits from a portfolio of proven and pre-defined options, including food, health, travel and active leisure, education and personal development, culture, and entertainment. Most benefits are provided in the form of electronic codes, allowing for fast and convenient product redemption.
- **MultiLife** promotes employee well-being within such key areas as mental health, personal development, healthy nutrition, and physical activity. In 2024, the MultiLife programme included psychological support, mindfulness courses, consultations with dieticians and trainers, a personalised diet planner, yoga courses, access to the Yes2Move online training platform, a package of basic preventive health screenings, access to e-books via Legimi, and development tools such as Lerni and Berlitz on Demand.

The Group's offering is further complemented by products provided by its subsidiaries, including VanityStyle:

- **FitProfit sport card** – providing access to thousands of sports and recreational facilities throughout Poland, along with discounts on services and purchases,
- **FitSport sport card** – allowing for up to eight entries per month to various facilities,
- **VanityStyle Zone** – an online platform offering access to online training sessions, among other services,
- **Mindfulness course** – featuring challenges and materials promoting a healthy lifestyle,
- **QlturaProfit** – a corporate incentive programme enabling employees to access theatre performances, cinema screenings, exhibitions, and other cultural events,
- **GetProfit** – a discount programme providing price reductions and discounts at selected facilities.

The Group does not offer products or services that are prohibited in certain markets. The Group is not active in the fossil fuel sector, chemicals production, controversial weapons production, or tobacco cultivation and production.

Revenue generated by the companies is reported in the consolidated financial statements of the Benefit Systems Group for the year ended 31 December 2024.

The products offered by the companies forming part of the Benefit Systems Group create value for customers (employers), their employees (B2B2C), individual users of sports and fitness facilities (B2C), business partners, and local communities. The Group's offering enables employers to implement and manage attractive non-pay benefits for employees, fostering increased employee engagement, satisfaction, and loyalty.

The image of an organisation that actively supports the health and well-being of its workforce may have a positive impact on employee retention and team effectiveness.

The Group's products enable users to engage in regular physical activity and support well-being, which directly translates into improved health, fitness, mental well-being, and overall quality of life. Improved health and greater resilience to stress may lead to enhanced productivity and well-being, both professionally and personally.

The partnership network established under the MultiSport programme contributes to the development of sports and recreational infrastructure, enabling partner facilities to reach a wider audience and secure stable revenue streams. The Group's activities support the creation of new jobs in local sports and fitness facilities, foster the development of local enterprises within the fitness sector, and help build communities based on sporting and health-oriented values.

The services provided by the Benefit Systems Group also generate broader social impact by supporting the promotion of a healthy lifestyle. Moreover, primarily through the MultiSport Foundation, the Group makes its offering available free of charge to various social groups as part of its mission to promote health and broaden access to professional physical activity programmes.

Vision and strategy for the development of the Benefit Systems Group by 2027:

The Benefit Systems Group aims to be the market leader in employee benefits in the categories of sport cards and well-being, as well as the leading fitness club operator in all markets in which it operates.

The strategic development directions of the Benefit Systems Group are as follows:

- focus on business growth based on the potential of the sport card and fitness markets in Poland and abroad,
- deeper penetration of the Polish market, expansion within existing international markets, and identification of new opportunities,
- continued expansion of the benefits offering to include well-being, nutrition, and physical health promotion,
- consolidation of the Group's product offering within a single platform to enhance employee experience and automate HR processes.

Objectives:

1. **Sport cards**

To reinforce our position as the undisputed leader in the sport card market. We aim to remain the product of first choice in Poland by strengthening our market advantage through expanded access to sports and fitness facilities, enhanced service offerings, and educational efforts to activate new users. In the Foreign Markets segment, we will focus on consolidating our leadership in the CEE fitness card market and increasing market penetration in Turkey.

2. **Fitness**

To ensure the growth rate of fitness clubs is at least equal to the growth rate of sport card sales. We will continue to expand our own network of clubs to improve service accessibility and offer formats tailored to the needs of different user groups. The broadest access to sports infrastructure, including the largest network of owned clubs, will be the Group's key competitive advantage.

3. **Cafeterias and HR tools**

To strengthen our leading position in the employee benefits cafeteria market. We will deliver a modern digital employee experience platform offering the broadest cafeteria benefit portfolio and state-of-the-art HR tools.

4. **Corporate well-being**

To deliver a holistic benefit addressing corporate well-being and establish a leadership position in this segment. Through the development of the innovative MultiLife platform, we aim to be the partner of choice for companies by providing comprehensive support in promoting employee well-being.

5. **Nutrition benefits**

To develop the nutrition benefit based on the SmartLunch product and maintain our number one market position. In the food segment, we will continue our expansion in the Polish market and pilot our presence in neighbouring international markets.

Sustainability strategy

The objective of the Benefit Systems Group ESG Strategy 2024–2026 is to contribute to a better quality of life for current and future generations. This will be achieved by fostering active communities and setting trends in sustainable development and in generating a positive impact on the surrounding environment.

As part of this strategy, the Group focuses on key areas related to the environment, social responsibility, and business conduct, all of which are aligned with the organisation's mission, values, and business objectives. The strategic activities are carried out both in Poland and in the foreign markets where the Benefit Systems Group operates.

In accordance with the arrangements of the ESG Committee adopted by the Management Board, the ESG Strategy will be updated in April 2025 following the conclusion of the first report under the new ESRS framework. The proposed revisions will primarily reflect the findings of the double materiality assessment and the management insights drawn from the gap analysis concerning mandatory ESRS disclosures. The review will also include an assessment of the ESRS requirements on the measurability of targets and additional management conclusions related to mandatory ESRS disclosures.

Specific operational objectives of the ESG Strategy linked to material topics are presented in the relevant sections

ESG Strategy 2024–2026

#BETTER LIFE

Society

Activity and engagement – promoting physical activity and strengthening the engagement of employees, users, and customers Priorities

Priorities:

- We activate and engage

Well-being and education – supporting the mental and physical well-being of employees, users, and customers

Priorities:

- We support well-being
- We support diversity
- We share knowledge

Business

Responsible management – building and implementing coherent standards of sustainable business and responsible governance within the Benefit Systems Group and across the entire value chain

Priorities:

- We manage responsibly and ethically
- We educate partners

Environment

The environment (for) everyone – collective care for natural resources and the climate, with future generations in mind

Priorities:

- Green Benefit
- Green Club

The ESG Strategy was developed prior to the completion of the double materiality assessment and the ESRS-compliant sustainability reporting process. The Benefit Systems Group developed its strategic ESG objectives based on a gap analysis conducted by an external advisor, following the publication of the ESG Report 2023 (prepared in accordance with the Global Reporting Initiative standards). This process enabled the identification of key ESG topics and the assessment of compliance with regulatory frameworks and market best practices. It included an impact assessment of the organisation's operations and an analysis of key industry-specific indicators, based on benchmarking, ESG ratings, and international standards (including SDGs and SASB). The audit also involved a review of more than 30 documents and stakeholder consultations, including 11 interviews. Based on the results of these analyses, a list of material topics was established, alongside the Group's ESG strengths and weaknesses. Strategic ESG objectives were developed through workshops with area owners and approved by the Management Board in the first quarter of 2024. These were then translated into specific tasks and included in annual budgets.

Baseline values were set using 2024 data, enabling ongoing monitoring and comparison of results against the ESG Strategy targets. The ESG Strategy comprises both core and supporting objectives, which together contribute to the delivery of strategic ambitions. For recurring (annual) objectives, interim targets have been defined to enable year-on-year progress assessment. Monitoring and control of ESG Strategy implementation are coordinated by the Head of ESG and Public Affairs, who also prepares materials for ESG Committee meetings. Following a positive recommendation from the ESG Committee, the minutes and performance results are submitted for approval to the Management Board.

The ESG Strategy encompasses a wide range of activities aimed at enhancing the organisation's positive impact on society and the environment, while being fully embedded in its business operations.

In the area of sport cards and fitness clubs, there is a strong alignment between business goals and ESG objectives. Expanding the network of own sports and fitness facilities and improving access to sports infrastructure directly supports social objectives focused on promoting physical activity and healthy lifestyles among various social groups ('We activate and engage' priority). However, it should be noted that infrastructure expansion presents environmental challenges – particularly higher consumption of energy, water, and other natural resources. The adaptation of fitness clubs (in line with the 'Green Benefit' and "Green Club" priorities) therefore requires additional investment in energy-efficient solutions and operational optimisation, which may affect operating costs and the pace of expansion.

Similar challenges are observed in the corporate well-being segment and the development of the MultiLife platform. This product responds to employers' increasing needs to support employee well-being, which aligns with the ESG Strategy priorities 'We support well-being' and 'We share knowledge'.

In the area of benefit cafeterias and HR tools, the development of a modern digital employee experience platform supports ESG objectives by offering users a flexible selection of personalised non-pay benefits. However, expansion into new markets and increasing service accessibility necessitate close collaboration with new suppliers and partners, posing challenges related to the implementation of ESG standards across the value chain ('We manage responsibly and ethically' and 'We educate partners' priorities). Measures to address this challenge are described in sections 'G1 Business conduct' and 'S2 Workers in the value chain').

SBM-2

Interests and views of stakeholders

STAKEHOLDERS

Stakeholders are all natural and legal persons within the organisation and in its direct and indirect environment who can affect or be affected – positively or negatively – by the undertaking.

By engaging with key stakeholders, the Benefit Systems Group seeks to build long-term relationships founded on trust and mutual understanding.

Stakeholder engagement enables the Group to better understand stakeholder needs, expectations and constraints, thereby allowing it to adjust its offering to the evolving demands of the market. The insights gained support continuous improvement of the Group's offering, contributing to enhanced comfort, safety and satisfaction for customers, partners and suppliers, while also promoting a healthy and active lifestyle.

The Group also places strong emphasis on engaging employees and associates (non-employees who are part of own workforce), with the aim of fostering an organisational culture built on collaboration, engagement and a shared sense of influence on the Group's development.

In its stakeholder relations, the Benefit Systems Group adapts communication channels to reflect the mutual needs of both parties. The organisation communicates transparently about both its successes and challenges and, wherever possible, prioritises direct dialogue over formal announcements and statements.

As a company listed on the Warsaw Stock Exchange, the Group is required to communicate in accordance with all applicable regulations and best practices governing publicly listed companies.

The Company's Supervisory Board includes three independent members who were nominated by entities representing the interests of different shareholder groups. These members actively participate in the meetings of the Supervisory Board, granting them access to key information regarding the Group and its strategic direction.

Key stakeholders and channels of engagement:

Stakeholders	Channels of engagement	
Shareholders, investors, managers and market analysts	○ Individual and group meetings (videoconferences) (over 100 in 2024) ○ Teleconferences, roadshows, broker conferences (at least ten times per year) ○ Retail investor conferences (once annually) ○ Current reports, periodic reports (quarterly), ESG reports (annually) ○ Investor presentations published on the investor relations website	○ Online chats with retail investors ○ Annual General Meetings (one in 2024), Extraordinary General Meetings (five in 2024) ○ Press and media coverage ○ Dedicated subpage on the corporate website
B2B customers, B2B2C users, B2C users	○ Individual and group meetings ○ User focus group research (twice annually) ○ NPS (annually) ○ Market research (twice to six times annually) ○ Helpline, Data Protection Officer, Compliance Officer ○ Contact form ○ MultiSport Online User Zone ○ Apps and online platforms, such as Yes2Move	○ Websites, ESG reports ○ Conferences, events, customer open days ○ Projects dedicated to customers and users ○ Social media: Facebook, Instagram, LinkedIn, Youtube ○ MultiLife chat ○ Newsletters and direct mail campaigns ○ Posters, leaflets ○ Whistleblowing to the Compliance Officer
Partners and suppliers	○ Individual meetings (around 2,650 meetings in 2024) ○ Annual conference for MultiSport partners ○ Telephone contact ○ Online platform: Partner Zone, including the Benefit Club programme ○ Partner satisfaction survey (annually)	○ Industry conferences ○ Dedicated subpages on websites of Group companies ○ Publications on industry portals and in social media, ESG reports ○ Whistleblowing to the Compliance Officer ○ CSR questionnaire for prospective suppliers

Stakeholders	Channels of engagement
Employees and associates	○ Intranet ○ Work Council (at least once per quarter, as required) ○ Newsletter (monthly) ○ Regular feedback, semi-annual performance reviews and evaluations ○ Satisfaction and engagement surveys, and thematic questionnaires (several times per year) ○ Company-wide events and meetings, including with the Management Board (several times per year, both in-person and online ○ Social programmes and initiatives involving employees (for example, two editions per year of the volunteering programme, the Santa campaign) ○ Internship programmes (once per year) ○ Training sessions and webinars (several times per year) ○ Online meeting applications ○ ESG reports, participation in materiality assessments ○ Whistleblowing mechanisms via the Compliance Officer and Ethics Committee members or Management Board members
Experts and media	○ Active press office: corporate website ○ Telephone and email communication ○ Regular distribution of press releases, primarily regarding the operations and products of the Group (49 press releases issued in 2024) ○ Media briefings coinciding with financial results announcements and participation in the Wellbeing Summit (four briefings in 2024) ○ Press publications, including interviews, articles and expert commentary (Group brands featured in 10,000 media publications or mentions in 2024) ○ Positioning of internal and external experts specialising in fields such as medicine, psychology and sport ○ Public awareness initiatives (for example, the annual MultiSport Index report on physical activity and sports engagement among Poles) ○ Special events/industry conferences – including media debates or events where the Group prepared speakers or reviewed content (four events in 2024) ○ Campaigns, reports, and communication platforms of external organisations, ESG reports ○ Webinars (ten in 2024)
Local communities and beneficiaries	○ Activities of the MultiSport Foundation ○ Dobry MultiUczynek programme (two editions per year) ○ Individual and group meetings ○ Industry conferences, anniversaries and beneficiary events ○ Dedicated subpages on the websites of individual Group companies ○ Publications on industry portals ○ Events, advertising and public awareness campaigns
Environment and climate	○ Reporting of environmental performance indicators ○ Cooperation with institutions and partnerships with environmental organisations ○ Participation in meetings, events, training sessions and conferences on environmental topics ○ Environmental training and workshops for employees ○ Employee-led environmental initiatives ○ Social projects with an environmental focus, also involving external stakeholders

Identification of stakeholders was enabled by the development of the Group's value chain, while the dialogue conducted (in the form of a survey and in-depth interviews) helped identify and assess impacts, risks and opportunities as part of the double materiality assessment. Stakeholder input plays a significant role in shaping the Group's activities, as described in detail in the section 'Society'. The organisation regularly gathers and analyses feedback from customers, users and employees through surveys, meetings, as well as NPS and satisfaction studies. The results of these analyses support the identification of areas requiring improvement and key trends. They are subsequently communicated to decision-makers and used to establish operational and project-related priorities.

The Management Board is informed of stakeholder concerns related to the Group's potential negative impacts. Beginning in December 2024, meetings of the ESG Committee – an advisory body to the Management Board – are held at least three times a year.

The Group's business model, focused on promoting physical activity, corporate well-being and employee benefits, brings significant social value by fostering a healthy lifestyle, physical fitness, and mental well-being.

At the same time, as with any large-scale operational activity, the business model may involve challenges and potential negative impacts – both on its own workforce and workers in the value chain, as well as on customers and end-users. The Group proactively identifies these areas and implements measures to mitigate risks and negative impacts, without altering the fundamental assumptions of its business strategy and business model.

Own workforce

With respect to its own workforce, the Group integrates the interests, views and rights of its employees as a core component of its strategy and business model. In addition to systematically collecting employee feedback (through questionnaires, in-depth interviews and satisfaction surveys), the Group has implemented operational procedures such as occupational health and safety (OHS) systems and the Diversity, Equity and Inclusion (DEI) Policy, which ensures respect for human rights in the workplace. The Group also offers development and support programmes for employees, tailored to market trends and employee expectations.

Value chain workers

Although the Group does not have a direct impact on workers in the value chain, it safeguards respect for their rights indirectly through requirements imposed on suppliers and partners. Contracts with partners not subject to verification through the CSR Questionnaire contain provisions referring to the business ethics principles upheld by the Benefit Systems Group. Furthermore, since 2023, the procurement process includes screening of potential trade partners against sanctions lists, enabling the identification of entities linked to high-risk jurisdictions.

End-users

In the context of end-users, their interests, views and rights enable the Group to optimise its business model by:

- adjusting the standards of sports services,
- responding to evolving health and demographic needs,
- minimising risks – the Group continuously enhances safety systems, data protection policies and compliance procedures to prevent privacy breaches and other threats associated with operational activities.

The key areas where changes have been implemented or are planned in response to stakeholder needs and expectations, are presented below.

In the area of fitness club offerings, end-user data is systematically analysed, enabling the rapid and effective adaptation of services. Based on regular surveys, adjustments are made to class schedules, service availability and instructor selection. This process is carried out in cycles (weekly, monthly and quarterly), allowing for a prompt response to user needs. In the long term, the development of new services and areas is planned, based on market trend analyses. The business strategy provides for an increase in the number of own fitness clubs to 600–650 by the end of 2027.

In the area of collaboration with MultiSport partners, the Group continues its efforts to provide education and support in key areas. In 2025, the launch of a training programme is planned, covering financial management, customer service, sales, marketing and team management.

The objective of the programme is to enhance the operational efficiency of sports and fitness facilities and to foster long-term partnerships.

With respect to customer relations, the Group places emphasis on systematic satisfaction surveys and the analysis of the needs of users of its products, in particular the flagship offerings: MultiSport, MultiLife and MyBenefit. Quarterly NPS surveys and annual comprehensive satisfaction surveys enable the identification of areas for improvement. Additionally, the implemented exit interview process facilitates a better understanding of the reasons for customer attrition, thereby supporting the continued refinement of the offering.

Benefit Systems International S.A., the company responsible for managing international operations, plans further expansion into foreign markets. These activities will be carried out in 2025–2027, subject to market conditions and analyses of local customer and user needs.

At the same time, the Benefit Systems Group is focused on expanding ESG-related education and advancing business transformation in this area, as well as enhancing the transparency of ESG reporting. A gap analysis and implementation plan for the adoption of missing ESG-related policies and procedures within the Group is planned, which will be followed by an update and refinement of the Group's key strategic ESG objectives. In 2025, the process of integrating the ESG Strategy into business operations will continue, along with the further operationalisation of strategic objectives. The ESG-related impact, risk and opportunity management system – integrated with the ESG Strategy – will be further developed. ESG-related risks and opportunities identified through the double materiality assessment will be incorporated into the existing enterprise risk management system and evaluated in accordance with a unified risk assessment methodology. These actions are intended to support the organisation's long-term resilience, strengthen investor trust, and enhance the Group's positive reputation both in Poland and internationally.

SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

DOUBLE MATERIALITY

Double materiality has two dimensions: impact materiality and financial materiality. A sustainability matter meets the criterion of double materiality if it is material from the impact perspective or the financial perspective or both.

IMPACT MATERIALITY

A sustainability matter is material from an impact perspective when it pertains to the undertaking's material actual or potential, positive or negative impacts on people or the environment over the short-, medium- or long-term. This includes impacts that are connected to the undertaking's own operations, and value chain, including through its products or services, as well as through its business relationships.

Material impacts were identified by the Group as part of the double materiality assessment conducted in 2024. Impacts occur across all three time horizons, with the exception of 'Impact on climate change through greenhouse gas emissions' and 'Impact on the depletion of natural resources due to the extensive use of materials for facility fit-out and equipment', both of which are assigned to the long-term horizon.

ESRS topic	Description of impact	Impact type	Location in the value chain
Climate change	Impact on climate change through greenhouse gas emissions.	↘ Negative	Entire value chain
	Impact on ozone layer depletion due to the use of refrigerants in building air conditioning systems.	↘ Negative	Own operations
	Impact on the consumption of natural resources through the use of energy (electricity, heat, and transport fuels) for operational purposes.	↘ Negative	Own operations
Water and marine resources	Impact on water availability due to increased water stress.	↘ Negative	Entire value chain
Resource use and circular economy	Impact on the depletion of natural resources due to the extensive use of materials for facility fit-out and equipment.	↘ Negative	Own operations
	Environmental impact resulting from the use, distribution, and sale of hard-to-recycle materials and products, such as promotional items, plastic membership cards, and food and workout supplements packaged in single-use containers, some of which are difficult to recycle.	↘ Negative	Own operations
	Potential impact on the volume of municipal waste released into the environment, due to waste generation and improper sorting by employees and users.	↘ Negative	Own operations
Own workforce	Impact on employment security due to the engagement of fitness facility associates under civil-law contracts or B2B arrangements.	↘ Negative	Own operations
	Impact on the development of associates through support provided to trainers and instructors at sports and fitness facilities in enhancing the knowledge and competencies necessary for the performance of their roles.	↗ Positive	Entire value chain
	Impact on the safety and health of employees and associates through procedures implemented at sports and fitness facilities.	↗ Positive	Own operations
	Potential impact on the health and safety of employees and associates due to the nature of their roles and working conditions, which may increase the likelihood of accidents or other adverse events associated with the performance of duties in sports and fitness facilities.	↘ Negative	Own operations
	Potential impact on the safety and health of employees and associates at sports and fitness facilities resulting from the direct or indirect delegation of tasks that may exceed their competencies or fall outside their defined responsibilities.	↘ Negative	Own operations
	Potential impact on the work-life balance of employees and associates at sports and fitness facilities due to frequent scheduling changes, insufficient time for consultation when such changes are introduced, and the incomplete implementation of dedicated communication tools (including the use of social media, which may not be universally accepted).	↘ Negative	Own operations

ESRS topic	Description of impact	Impact type	Location in the value chain
Value chain workers	Potential indirect negative impact on working conditions of workers in the value chain, particularly in sports and fitness facilities, due to the absence of monitoring of working conditions.	↘ Negative	Upstream
	Potential indirect negative impact on the health of workers in the value chain due to the nature of their roles and working conditions, which may increase the likelihood of accidents or other adverse events associated with the performance of duties.	↘ Negative	Upstream
Affected communities	Positive impact on local communities through the organisation of sports programmes and events that enhance access to physical activity and foster social integration, particularly among children and youth.	↗ Positive	Downstream
End-users	Potential impact on the safety and health of users of both proprietary and partner-operated sports and fitness facilities due to inadequate management of safety procedures or inadequate maintenance of air conditioning systems, which may lead to health risks, serious injuries, or accidents.	↘ Negative	Downstream
	Potential impact on end-users' health due to misleading or incomplete information in content related to physical and mental health, created by individuals lacking appropriate qualifications. Inadequate training and outdated knowledge may affect the quality of health and fitness services, with implications for user well-being.	↘ Negative	Downstream
	Potential impact on the right to privacy of users resulting from breaches of personal data privacy and security.	↘ Negative	Downstream
	Impact on physical and mental health through increased physical activity and improved fitness enabled by the Group's products.	↗ Positive	Downstream
Business conduct	Impact on corporate culture through the implementation and adherence to the Code of Ethics and good practices within the Poland segment, which positively affects both internal and external stakeholders.	↗ Positive	Entire value chain

The double materiality assessment conducted in 2024 identified topics that are consistent with the Group's existing business strategy focused on providing non-pay employee benefit solutions in the areas of sports, recreation and well-being, as well as a flexible benefits programme. At the same time, the Group acknowledges the need to further explore the sustainability matters identified as material from an impact perspective. The objective is to ensure their effective integration into business decision-making processes.

FINANCIAL MATERIALITY

A sustainability matter is material from a financial perspective if it generates risks or opportunities that affect (or could reasonably be expected to affect) the undertaking's financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium or long term.

The double materiality assessment also identified material risks and opportunities:

ESRS topic	Type	Description	Location in the value chain
Climate change	Opportunity	Reduced winter heating costs in Europe due to a declining heating degree days index.	Own operations
	Risk	Inclusion of commercial buildings in the EU Emissions Trading System (ETS) may increase heating costs for sports and fitness facilities.	Own operations
	Risk	Costs related to the required implementation of low-emission technologies, including those for heating, transport, and energy-efficient equipment.	Own operations
	Risk	Increased electricity costs due to energy shortages resulting from adverse weather conditions (high temperatures, etc.) or legislative developments, such as the introduction of additional charges.	Entire value chain
	Risk	Increased likelihood of extreme weather events, which may result in asset impairment (for example, damage to sports and fitness facilities), operational disruptions, or other adverse effects.	Entire value chain
	Risk	Operational disruptions at facilities due to adverse weather events, such as heatwaves necessitating temporary closures and preventing employees from attending work.	Own operations
Water and marine resources	Risk	Water use restrictions that may result in water shortages at own or partner-operated facilities, thereby limiting the availability of the Group's services.	Own operations

ESRS topic	Type	Description	Location in the value chain
Circular economy	Opportunity	Implementing waste management practices that enable selective waste collection and recycling. This may include the use of appropriate recycling bins and the sale of products and beverages in mono-material packaging.	Own operations
Own workforce	Opportunity	Investing in the development of employees and associates, leading to increased operational efficiency and service quality, thereby strengthening the Group's competitiveness.	Own operations
	Risk	The Group is exposed to the risk of breaches of employees' and associates' right to privacy, particularly in relation to personal data protection and information security. Data breaches may lead to unauthorised access to sensitive information, such as HR and payroll data, and may result in severe legal, financial and reputational consequences.	Own operations
Consumers and end-users	Risk	Risks associated with potential restrictions on the operation of sports and fitness facilities during a future pandemic. These include the consequences of complying with stringent sanitary requirements, maintaining social distancing, or suspending operations. Such disruptions could lead to reduced service availability, a decline in user numbers, and increased operating costs associated with the implementation of necessary health and safety measures. Additionally, there is a risk of revenue loss due to suspended operations, as well as potential challenges in returning to business as usual following the lifting of restrictions.	Entire value chain
	Risk	The Group is exposed to the risk of breaches of end-users' right to privacy, particularly in relation to personal data protection and information security. Data breaches may lead to unauthorised access to sensitive information and may result in severe legal, financial and reputational consequences.	Own operations
	Risk	The Group is exposed to risks associated with an ageing population and demographic shifts, which may affect demand for its services (MultiSport). This risk is associated with the need for a flexible response to evolving user expectations, which may require adjustments to product and communication strategies.	Downstream

The double materiality assessment carried out for the first time in 2024, together with the reporting process in accordance with the ESRS, enabled the Group to identify material impacts, risks and opportunities related to its business model, value chain and strategy.

Currently, the effects of these impacts, risks and opportunities do not require fundamental changes to the business model, but they highlight the need to further strengthen the management of selected sustainability areas. Most negative social impacts are potential impacts, primarily due to sector-specific challenges such as the likelihood of accidents or the protection of privacy. The Group has implemented numerous mitigating policies and actions. As the number of the Group's own sports and fitness facilities increases, the materiality of environmental topics also grows. These have been mapped through the double materiality assessment and may be formally addressed in the coming years to the extent possible. Due to certain limitations, such as leasing rather than owning real estate, the Group may not be able to influence all environmental aspects. In practice, the Group is gradually introducing new policies and procedures, including the due diligence policy called the Benefit Systems Group Responsible Business Conduct Policy planned for 2025 (covering, among other things, the protection of human rights and the prevention of violations across the value chain). In the environmental area, the Group is developing the Green Club standard, which aims to reduce water and energy consumption and introduce circular economy solutions. These initiatives complement the existing strategy without requiring changes to the business model itself.

In 2025, the Group plans a comprehensive analysis of identified gaps in policies, procedures and the management of material sustainability topics. The results of this analysis will inform the necessary actions and any potential directions for change. The Head of ESG and Public Affairs will be responsible for monitoring the implementation of these actions, and the outcomes will be reported to the Management Board. The ESG Committee will provide advisory support for the implementation of the recommended changes.

As part of the climate resilience analysis of the Group's strategy and business model, a scenario analysis was conducted, as described in IRO-1 Description of the process to identify and assess material impacts, risks and opportunities.

In the 2024 sustainability reporting cycle, the Group has made use of the transitional provision allowing the omission of disclosures on anticipated financial effects, in accordance with the phased-in disclosure requirements.

The Group has not identified any changes in material impacts, risks or opportunities compared to the previous reporting period, as 2024 marks the first year of ESG reporting based on a double materiality assessment and in alignment with the ESRS.

In its 2024 sustainability report, the Group discloses one entity-specific metric under topical standard S3, related to a positive social impact, which goes beyond the topics listed in ESRS AR 16 covered by this standard.

Material impacts, risks and opportunities

IRO-1

Description of the process to identify and assess material impacts, risks and opportunities

In 2024, the Benefit Systems Group carried out its first double materiality assessment to identify key sustainability-related topics.

The Group conducted an analysis of impacts, risks, and opportunities for the following topics as part of the double materiality process:

- matters related to climate change, biodiversity, and ecosystems,
- matters related to water, pollution, circular economy, and business conduct,
- matters related to human rights impacts across the entire value chain,
- matters related to own workforce, workers in the value chain, affected communities, and consumers and end-users, which were not covered during the human rights impact workshop,
- matters related to business conduct.

For the purpose of the assessment, the Group mapped out its value chain, which served as the foundation for identifying material areas of impact, risk, and opportunity. The analysis considered key internal documents, current and planned Group activities, and organisational practices.

In addition, a peer benchmarking analysis was conducted across the European market to determine which ESG matters are material to entities with a similar business profile. The main findings indicate that the key impact areas of peer organisations overlap with Benefit Systems' operations, and primarily concern safety, data privacy, training, emissions, and business ethics.

External documents were also taken into account in the assessment process:

- SASB Standards – Leisure Facilities, focusing on three topics: Energy Management, Customer Welfare, and Employee Health and Safety, which are reported under standards E1, S4, and S1,
- MSCI ESG Industry Materiality Map, including an analysis of the following sectors: Leisure Facilities, Healthcare Services, and Specialised Consumer Services.

In summary, the following topical areas were incorporated into the materiality assessment: water stress, carbon emissions, labour management, product safety and quality, governance, data privacy and security, human capital development, and health and safety.

Internal and external stakeholders were involved in the double materiality process, including employees, associates, partners, suppliers, customers, local communities, NGOs, and industry organisations. Surveys and interviews were conducted, and the results were analysed and presented during an internal workshop on human rights impacts. During the workshop, the Group identified and assessed actual and potential negative impacts on human rights occurring in its own operations, and its upstream and downstream value chain.

A key element of the process to identify and assess impacts, risks and opportunities was a series of thematic workshops, which formed the basis for the double materiality assessment. During these sessions, the impacts previously identified through the analysis of internal and external documentation were reviewed, and the related risks and opportunities were identified, taking into account potential financial effects. Additional matters material to the Group's operations were also identified. Workshop participants were involved in assessing impacts, risks and opportunities using predefined criteria. These assessments were validated by the individuals responsible for each area within the organisation and by the ESG department.

Scale, scope, irremediable character, and likelihood were assessed on a five-point scale. For actual positive and negative impacts, the final score was calculated based on the arithmetic mean of the values for scale and scope, and – where applicable for negative impacts – irremediable character. A severity and likelihood matrix, as recommended by EFRAG, was applied. Additionally, for human rights-related impacts, a separate matrix was used, where the severity of the impact took precedence over its likelihood.

The arithmetic mean was also used to calculate the final assessment of risks and opportunities (based on scale and likelihood). The median was applied to determine the cut-off point for materiality. Impacts, risks and opportunities with scores above the median were classified as material. The topics excluded based on the median threshold were reviewed, which led to the decision to include two additional cases with scores equal to the median in the list of material topics. In October 2024, the list of material reportable ESG matters was approved by the Management Board and shared with employee representatives involved in the process. In December 2024, it was approved by the Audit Committee of the Supervisory Board.

The scope and method of integrating the process to identify, assess and manage impacts and risks into the overall enterprise risk management framework and using it to assess the Group's overall risk profile and risk management practices are described in section GOV-5.

The Group has not yet determined the frequency of conducting a full double materiality assessment. This will depend on the extent of changes in market conditions, the Group's business model, and future regulatory requirements. A relevant review and analysis will be performed at the beginning of each annual reporting cycle. However, the Group plans to carry out a full double materiality assessment at least once every two years.

Due diligence

No formal human rights policy has been adopted at the Group level. However, in 2024, work commenced on the implementation of a due diligence policy called the Benefit Systems Group Responsible Business Conduct Policy, which is scheduled for adoption in 2025.

Although the Group has not yet formalised its due diligence regulations, it undertakes a range of measures to identify, assess, and manage actual and potential negative impacts on people and the environment, including in the context of human rights protection.

As part of the double materiality assessment process, the Group conducted stakeholder impact research to identify and assess impacts related to the Group's operations, including those concerning human rights.

The research was carried out through:

- **surveys** completed by 708 stakeholders (including employees, suppliers, business partners, and local communities),
- **in-depth interviews** conducted with eight representatives of key stakeholder groups,
- **consultations with external experts** from an advisory agency.

Based on the findings, the Group received information on its actual and potential negative human rights impacts. This served as a basis for monitoring these topics, collecting detailed data, and setting targets aimed at mitigating negative impacts.

In support of the due diligence process as an ongoing commitment, the Group has implemented whistleblowing procedures, as described in the section 'Business conduct'. The Group has implemented an Internal Whistleblowing Procedure within the scope defined by the Whistleblower Protection Act. In the Poland segment, the Procedure has been adopted by Benefit Systems S.A., VanityStyle Sp. z o.o., and Benefit Systems International S.A. In foreign subsidiaries subject to local whistleblower protection regulations, appropriate procedures have been introduced in accordance with local requirements.

The Group also maintains various communication channels for stakeholder engagement, including working meetings, online consultations, and other forms of dialogue that support ongoing monitoring of developments within the organisation and its external environment. The primary tool for monitoring the effectiveness of due diligence measures and for the communication of relevant information is the annual ESG report prepared in accordance with ESRS, which will be published regularly and will serve as the Group's key channel of communication on due diligence-related matters.

G1 IRO-1

Description of the processes to identify and assess material business conduct-related impacts, risks and opportunities

The Group took into account key criteria such as location, business profile, sector, and transaction structure when identifying material impacts, risks and opportunities. The location of operations was analysed in the context of ESG regulatory compliance across different jurisdictions and the potential ethical risks associated with foreign subsidiaries.

Given the Group's business profile and the specific nature of the employee benefits sector, particular attention was paid to several key areas:

- Whistleblowing procedures – these played a critical role, particularly in the prevention of misconduct, which constitutes a material risk factor in the service industry.
- Awareness of policies and procedures among own workforce – due to the large number of employees and associates, the materiality survey included questions on awareness of internal policies (including ethical standards, diversity, anti-corruption, and whistleblowing procedures), ethical standards and business practices to ensure their appropriate application.
- Extensive network of partners and suppliers – the wide network of suppliers and partners required an analysis of collaboration criteria and procurement rules, which are essential for effective supply chain and business relationship management.

The transaction structure, particularly its impact on the financial stability of small businesses, was reviewed, including through an analysis of payment timeliness, which revealed no material negative impacts.

E1 IRO-1

Description of the processes to identify and assess material climate-related impacts, risks and opportunities

Climate-related impacts, risks and opportunities were identified by the Group in the double materiality assessment. The Group also analysed its resources, assets and operations across the value chain, identifying actual and potential sources of greenhouse gas emissions across all three scopes.

Physical climate risks were determined based on climate hazards outlined in the high-emission IPCC SSP5-8.5 scenario, as presented in the IPCC report Climate Change 2021: The Physical Science Basis. The Group assessed the potential occurrence of events listed in ESRS AR 11, focusing on regions in Eastern, Central and Southeastern Europe, as well as Turkey. Risks were identified related to potential supply chain disruptions or impediments to service delivery arising from climate hazards such as extreme weather events, rising sea levels and extreme temperatures. Furthermore, forecasts of wildfires, landslides, land subsidence and severe weather events indicated a potential for damage to assets owned by the Group or used across the value chain. In connection with these climate-related threats, risks were also identified regarding increased employee absenteeism – both in the form of general workday disruptions and more frequent instances of sick leave.

For the purpose of determining climate risk time horizons, the Group applies definitions consistent with the ESRS standard: short-term is defined as up to one year, medium-term as one to five years, and long-term as five years or more.

Following the identification of climate hazards, the Group assessed the degree to which its assets may be exposed. This assessment was also based on the IPCC SSP5-8.5 high-emission scenario. In evaluating the extent to which a given risk may materialise, the Group considered the geographic areas in which it operates and regions linked to its upstream value chain. These areas were analysed using the models outlined in the IPCC report1. In assessing the severity of each risk, the Group considered the potential financial loss associated with their occurrence.

Climate transition risks and opportunities in the Group's own operations and value chain were identified based on the Net Zero Emissions by 2050 Scenario developed by the International Energy Agency. The analysis involved mapping the Group's activities onto a model consistent with this scenario. Key assumptions included increased awareness and demand for environmentally sustainable services among consumers, business partners and the financial sector, the introduction of new and planned EU policies and strategic frameworks, and their implications for the Group's own operations. The assessment considered four categories of potential risks and opportunities:

- policy and legal,
- technological,
- market-related,
- reputational.

The time horizons adopted by the Group for transition risks are aligned with the ESRS and based on data provided in the International Energy Agency's scenario and the anticipated timeline of EU policy implementation: the short-term is defined as up to one year, the medium-term up to five years, and the long-term as five years or more.

The identification of climate transition events and the assessment of the Group's assets and business activities were informed by examples provided by the Task Force on Climate-related Financial Disclosures (TCFD). These examples were reviewed and evaluated in the context of the Group's business profile as well as low- and high-emissions scenarios included in the Net Zero Emissions by 2050 and IPCC SSP5-8.5 scenarios.

The Group did not identify any assets and business activities that are incompatible with or need significant efforts to be compatible with a transition to a climate-neutral economy. No climate-related assumptions have been incorporated into the Group's financial statements.

At present, climate-related matters are only marginally integrated into the Group's strategy and business model. The Group plans to conduct a detailed climate resilience analysis of its strategy and business model in the coming years. This will include an evaluation of the organisation's ability to adapt to climate change, including potential adjustments to operations, products and services.

E3 IRO-1

Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

The Group analysed its value chain, resources, assets and operations to identify actual and potential future sources of water abstraction and consumption. The analysis revealed that the Group's principal activities related to water resources concern swimming pools and water use in the bathrooms of sports and fitness facilities.

As part of the analysis, the Group engaged stakeholders by distributing questionnaires and conducting interviews. This enabled the collection and review of feedback and insights on the Group's impacts and dependencies in relation to sustainability matters associated with water resources.

E5 IRO-1

Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

To identify actual and potential sources of raw materials and consumables, the Group examined its resources, assets, operations and value chain relationships.

Stakeholders were involved in the identification process through surveys and interviews, during which the Group's sustainability-related matters, including circular economy practices, were discussed.

Non-material topics

E2 IRO-1

Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

A review of the Group's own locations and business model was conducted to identify impacts, risks and opportunities related to pollution across its own operations as well as within the upstream and downstream value chain. Consultations were carried out as part of the due diligence process. The analysis drew on reference sources such as the Encore Nature database, statistical publications issued by Statistics Poland (GUS), and academic literature. It was assumed that the Group's business profile does not significantly deviate from the assumptions outlined in these sources. Areas of activity with potential pollutant emissions were identified, including:

- emissions of volatile organic compounds (VOCs) and substances based on aliphatic alcohols, resulting from the use of cleaning and disinfecting agents in sports and fitness facilities,
- exhaust emissions generated by employee vehicles, particularly in connection with business travel and commuting.

The analysis determined that none of these topics is material from the Group's perspective.

E4 IRO-1

Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities

A review of the Group's own locations and business model was conducted to identify impacts, risks, opportunities, and dependencies associated mainly with ecosystem services, biodiversity and ecosystems across its own operations as well as within the upstream and downstream value chain. Consultations were carried out as part of the due diligence process.

The analysis used reference databases such as Encore Nature, the Biodiversity Risk Filter, IBAT, and other academic literature. It was assumed that the Group's business profile does not significantly deviate from the assumptions outlined in these sources. The assessment considered land-use impacts arising from the lease of commercial premises, impacts on aquatic ecosystems due to water abstraction, and indirect contributions to climate change through the use of fossil fuels. In addition, potential regulatory changes, such as water retention requirements, were taken into account.

The analysis determined that none of these topics is material from the Group's perspective

ESRS compliance tables

IRO-3

Disclosure requirements in ESRS covered by the undertaking's sustainability statement

Disclosures required in relation to impacts, risks and opportunities that the undertaking has identified as material were determined by mapping the impacts, risks and opportunities to topical standards during the double materiality assessment process and applying materiality thresholds.

Disclosure number	Disclosure title	Section in this report / materiality
BP-1	General basis for preparation of sustainability statements	General information
BP-2	Disclosures in relation to specific circumstances	General information
GOV-1	The role of the administrative, management and supervisory bodies	General information
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	General information
GOV-3	Integration of sustainability-related performance in incentive schemes	General information
GOV-4	Statement on due diligence	General information
GOV-5	Risk management and internal controls over sustainability reporting	General information
SBM-1	Strategy, business model and value chain	General information
SBM-2	Interests and views of stakeholders	General information
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	General information
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	General information
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	General information
E1-1	Transition plan for climate change mitigation	Environment
E1 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Environment

Disclosure number	Disclosure title	Section in this report / materiality
E1 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	General information
E1-2	Policies related to climate change mitigation and adaptation	Environment
E1-3	Actions and resources in relation to climate change policies	Environment
E1-4	Targets related to climate change mitigation and adaptation	Environment
E1-5	Energy consumption and mix	Environment
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	Environment
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	Not applicable
E1-8	Internal carbon pricing	Not applicable
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Exemption under Appendix C of ESRS 1
E3 IRO-1	Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	General information
E3-1	Policies related to water and marine resources	Environment
E3-2	Actions and resources related to water and marine resources	Environment
E3-3	Targets related to water and marine resources	Environment
E3-4	Water consumption	Environment
E3-5	Anticipated financial effects from water and marine resources-related impacts, risks and opportunities	Exemption under Appendix C of ESRS 1
E5 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Environment
E5 IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	General information
E5-1	Policies related to resource use and circular economy	Environment
E5-2	Actions and resources in relation to resource use and circular economy	Environment
E5-3	Targets related to resource use and circular economy	Environment
E5-4	Resource inflows	Environment
E5-5	Resource inflows	Environment
E5-6	Potential financial effects from resource use and circular economy-related risks and opportunities	Exemption under Appendix C of ESRS 1
S1 SBM-2	Interests and views of stakeholders	General information

Disclosure number	Disclosure title	Section in this report / materiality
S1 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Society
S1-1	Policies related to own workforce	Society
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	Society
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	Society
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Society
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Society
S1-6	Characteristics of the undertaking's employees	Society
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	Society
S1-8	Collective bargaining coverage and social dialogue	Not disclosed
S1-9	Diversity metrics	Not disclosed
S1-10	Adequate wages	Not disclosed
S1-11	Social protection	Not disclosed
S1-12	Persons with disabilities	Not disclosed
S1-13	Training and skills development metrics	Society
S1-14	Health and safety metrics	Society
S1-15	Work-life balance metrics	Society
S1-16	Remuneration metrics (pay gap and total remuneration)	Not disclosed
S1-17	Incidents, complaints and severe human rights impacts	Not disclosed
S2 SBM-2	Interests and views of stakeholders	General information
S2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Society
S2-1	Policies related to value chain workers	Society
S2-2	Processes for engaging with value chain workers about impacts	Society
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	Society
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	Society
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Society

Disclosure number	Disclosure title	Section in this report / materiality
S3 SBM-2	Interests and views of stakeholders	General information
S3 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Society
S3-1	Policies related to affected communities	Society
S3-2	Processes for engaging with affected communities about impacts	Society
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	Society
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Society
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Society
S4 SBM-2	Interests and views of stakeholders	Society
S4 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Society
S4-1	Policies related to consumers and end-users	Society
S4-2	Processes for engaging with consumers and end-users about impacts	Society
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Society
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	Society
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Society
G1-1	Business conduct policies and corporate culture	Business conduct
G1-2	Management of relationships with suppliers	Business conduct
G1-3	Prevention and detection of corruption and bribery	Not disclosed
G1-4	Incidents of corruption or bribery	Not disclosed
G1-5	Political influence and lobbying activities	Not disclosed
G1-6	Payment practices	Not disclosed
G1-6	Payment practices	Not disclosed

List of datapoints in cross-cutting and topical standards that derive from other EU legislation

Not material: Information identified as not material in the course of the double materiality assessment

Not applicable: Information not relevant to the Group's activities

Disclosure number	Datapoint	Datapoint title	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Material	Page
ESRS 2 GOV-1	21 d	Board gender diversity	x		x		Reported	10
ESRS 2 GOV-1	21 e	Percentage of board members who are independent			x		Reported	10
ESRS 2 GOV-4	30	Statement on due diligence	x				Reported	19
ESRS 2 SBM-1	40 d (i)	Involvement in activities related to fossil fuel activities	x	x	x		Not applicable	
ESRS 2 SBM-1	40 d (ii)	Involvement in activities related to chemical production	x		x		Not applicable	
ESRS 2 SBM-1	40 d (iii)	Involvement in activities related to controversial weapons	x		x		Not applicable	
ESRS 2 SBM-1	40 d (iv)	Involvement in activities related to cultivation and production of tobacco			x		Not applicable	
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050				x	Reported	65
ESRS E1-1	16 g	Undertakings excluded from Paris-aligned benchmarks		x	x		Reported	65
ESRS E1-4	34	GHG emission reduction targets	x	x	x		Reported	67
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	x				Not applicable	
ESRS E1-5	37	Energy consumption and mix	x				Reported	68

ESRS E1-5	40–43	Energy intensity associated with activities in high climate impact sectors	x				Not applicable	
ESRS E1-6	44	Gross Scope 1, 2, 3 and total GHG emissions	x	x	x		Reported	69
ESRS E1-6	53–55	Gross GHG emissions intensity	x	x	x		Reported	72
ESRS E1-7	56	GHG removals and carbon credits				x	Not applicable	
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			x		Exemption under phase-in provisions	
ESRS E1-9	66 a	Disaggregation of monetary amounts by acute and chronic physical risk		x			Exemption under phase-in provisions	
ESRS E1-9	66 c	wLocation of significant assets at material physical risk		x			Exemption under phase-in provisions	
ESRS E1-9	67 c	Breakdown of the carrying value of real estate assets by energy-efficiency classes		x			Exemption under phase-in provisions	
ESRS E1-9	69	Degree of exposure of the portfolio to climate- related opportunities			x		Exemption under phase-in provisions	
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	x				Not material	
ESRS E3-1	9	Water and marine resources	x				Reported	77
ESRS E3-1	13	Dedicated policy	x				Reported	77
ESRS E3-1	14	Sustainable oceans and seas	x				Not applicable	
ESRS E3-4	28 c	Total water recycled and reused	x				Reported	78
ESRS E3-4	29	Total water consumption in m3 per net revenue on own operations	x				Reported	78
ESRS 2 SBM-3 E4	16 a (i)	Biodiversity sensitive area	x				Not material	

ESRS 2 SBM-3 E4	16 b	Impact on terrestrial ecosystems	x				Not material	
ESRS 2 SBM-3 E4	16 c	Endangered species	x				Not material	
ESRS E4-2	24 b	Sustainable land / agriculture practices or policies	x				Not material	
ESRS E4-2	24 c	Sustainable oceans / seas practices or policies	x				Not material	
ESRS E4-2	24 d	Policies to address deforestation	x				Not material	
ESRS E5-5	37 d	Non-recycled waste	x				Reported	81
ESRS E5-5	39	Hazardous waste and radioactive waste	x				Not applicable	
ESRS 2 SBM-3 S1	14 f	Risk of incidents of forced labour	x				Reported	84
ESRS 2 SBM-3 S1	14 g	Risk of incidents of child labour	x				Reported	84
ESRS S1-1	20	Human rights policy commitments	x				Reported	86
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions			x		Reported	86
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	x				Reported	86
ESRS S1-1	23	Workplace accident prevention policy or management system	x				Reported	86
ESRS S1-3	32 c	Grievance/complaints handling mechanisms	x				Reported	93
ESRS S1-14	88 b and c	Number of fatalities and number and rate of work-related accidents	x		x		Reported	111
ESRS S1-14	88 e	Number of days lost to injuries, accidents, fatalities or illness	x				Reported	111
ESRS S1-16	97 a	Unadjusted gender pay gap	x		x		Not material	
ESRS S1-16	97 b	Excessive CEO pay ratio	x				Not material	
ESRS S1-17	103 a	Incidents of discrimination	x				Not material	
ESRS S1-17	104 a	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	x		x		Not material	

ESRS 2 SBM-3 S2	11 b	Significant risk of child labour or forced labour in the value chain	x				Reported	114
ESRS S2-1	17	Human rights policy commitments	x				Reported	116
ESRS S2-1	18	Policies related to value chain workers	x				Reported	116
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	x		x		Reported	116
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			x		Reported	116
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	x				Reported	119
ESRS S3-1	16	Human rights policy commitments	x				Not material	
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines	x		x		Not material	
ESRS S3-4	36	Human rights issues and incidents	x				Not material	
ESRS S4-1	16	Policies related to consumers and end-users	x				Reported	129
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	x		x		Reported	129
ESRS S4-4	35	Human rights issues and incidents	x				Reported	133
ESRS G1-1	10 b	United Nations Convention against Corruption	x				Reported	141
ESRS G1-1	10 d	Protection of whistle-blowers	x				Reported	145
ESRS G1-4	24 a	Fines for violation of anti-corruption and anti-bribery laws	x		x		Not material	
ESRS G1-4	24 b	Standards of anti-corruption and anti-bribery	x				Reported	175

02.

Environment

EU Taxonomy

The disclosure of information pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment is a classification tool that helps investors identify which economic activities can be considered environmentally sustainable.

It is commonly referred to as the **EU Taxonomy.**

The purpose of the EU Taxonomy is to support investors in contributing to the goals of the European Green Deal, including the transition to a safe, climate-neutral, climate-resilient, and more resource-efficient circular economy.

Under the EU Taxonomy, the Benefit Systems Group is required to disclose the following:

- the percentage of turnover derived from products or services associated with environmentally sustainable economic activities,
- the percentage of capital expenditure (CapEx) related to assets or processes associated with environmentally sustainable economic activities,
- the percentage of operating expenditure (OpEx) related to assets or processes associated with environmentally sustainable economic activities.

In accordance with the EU Taxonomy, for an economic activity to be considered environmentally sustainable, it must meet all four of the following criteria:

- it contributes substantially to the achievement of at least one environmental objective,
- it does no significant harm to any of the other environmental objectives,
- it complies with minimum safeguards,
- it complies with the applicable technical screening criteria, as set out in Annexes I to IV of Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023, supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives; and Annexes I and II of Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives. The six environmental objectives defined under the EU Taxonomy are:
  - climate change mitigation,
  - climate change adaptation,
  - sustainable use and protection of water and marine resources,
  - transition to a circular economy,
  - pollution prevention and control,
  - protection and restoration of biodiversity and ecosystems.

The detailed disclosure requirements for the above criteria are governed by Articles 1, 2, 8, and 10, as well as Annexes I, II, and XII of Commission Delegated Regulation (EU) 2021/2178, OJ L 443 of 10 December 2021, pp. 9–67, which supplements the provisions laid down in Article 8 of the Taxonomy Regulation.

The Benefit Systems Group has prepared its EU Taxonomy report covering all six environmental objectives under the Taxonomy for the second consecutive time.

To meet the reporting obligation concerning the extent to which the activities of the Benefit Systems Group are environmentally sustainable within the meaning of the EU Taxonomy, a Taxonomy alignment assessment process was developed and conducted.

EU Taxonomy alignment assessment process

- **Process organisation:** the reporting process within the Benefit Systems Group is overseen and coordinated by the ESG Department. Acting on behalf of the Management Board of Benefit Systems S.A., the Head of ESG and Public Affairs is responsible for the process. The Controlling Team within the Finance Department is responsible for allocating financial data to individual Taxonomy-related activities and for the preparation of the final Directors' Report on the operations of the Benefit Systems Group. Representatives of all companies within the Benefit Systems Group are involved in various stages of the reporting process. The Group was supported by an external advisor throughout the process of preparation of the EU Taxonomy report.
- **Assessment of compliance with minimum safeguards:** the assessment of compliance with minimum safeguards is conducted independently of the assessment of compliance with the Technical Screening Criteria (TSC). This assessment is carried out at the Group level.
- **Analysis of the Benefit Systems Group's activities in terms of their inclusion in the EU Taxonomy:** based on completed questionnaires and the responses received, the Group determined which of its economic activities fall within the scope of the TSC, that is, which are included in the EU Taxonomy. Taxonomy-eligible activities were identified based on the descriptions of economic activities provided in annexes to the delegated regulations establishing the Technical Screening Criteria. In cases of uncertainty, the Group referred to the NACE classification and guidance or supporting documentation issued by the European Commission and the Platform on Sustainable Finance.
- **Assessment of EU Taxonomy alignment:** using the criteria set out in the TSC and based on European Commission guidance, the Group assessed whether its economic activities qualify as environmentally sustainable under the EU Taxonomy. As part of this process, the Group compiles supporting documentation demonstrating compliance with the TSC.
- **Allocation:** at this stage, the Group allocated turnover, capital expenditure (CapEx), and operating expenditure (OpEx) to the relevant economic activities. These allocations formed the basis for the preparation of the Taxonomy reporting tables.
- **Presentation of results:** in addition to tabular disclosures of the Taxonomy alignment assessment, the Group also provided a detailed description of the assessment process and the economic activities covered by the TSC, in order to facilitate user understanding of the Benefit Systems Group's approach to the EU Taxonomy.

Assessment of compliance with the Technical Screening Criteria (TSC)

The Benefit Systems Group has assessed selected Taxonomy-eligible economic activities for compliance with the Technical Screening Criteria. The assessment covered the criteria for substantial contribution across all environmental objectives. A more detailed description of this process is provided in the sections relating to the respective KPIs.

Assessment of compliance with the Do No Significant Harm (DNSH) criteria

The Do No Significant Harm (DNSH) requirement is intended to ensure that making a substantial contribution to one environmental objective does not come at the expense of the other objectives. As part of the Group's EU Taxonomy alignment assessment, all economic activities that met the substantial contribution criteria were subsequently reviewed for compliance with the DNSH criteria.

Minimum safeguards

The Benefit Systems Group assessed whether its economic activities meet the requirements laid down in Article 18 of Regulation (EU) 2020/852, in order to confirm compliance with the **minimum safeguards.**

The Group conducted the assessment using a tool based on the methodology proposed by the Platform on Sustainable Finance. The assessment confirmed that the Group meets the requirements of the **minimum safeguards.** The implementation of **minimum safeguards** in the relevant areas is detailed in the following sections of this report:

- due diligence processes: section ESRS 2: table GOV-4 + subsection Due diligence and IRO-1,
- respect for human rights: section ESRS 2: table GOV-4 + subsection Due diligence and IRO-1,
- respect for labour rights: section Society, subsection Own workforce, and section Business conduct,
- protection of consumer rights (customers and end-users): section Society, subsection Consumers and end-users,
- Fair competition: section Business conduct.

In areas not explicitly covered in this report:

- anti-corruption: The Benefit Systems Group is guided by the requirements of the OECD Guidelines, including through internal policies such as the Anti-Corruption Policy, Gifts and Hospitality Procedure, and Conflicts of Interest Procedure,
- tax policy: The Benefit Systems Group complies with tax legislation, including its general principles.

Accounting policies

The calculation of the turnover, capital expenditure (CapEx) and operating expenditure (OpEx) indicators was based on the definitions set out in Annex I of Commission Delegated Regulation (EU) 2021/2178. The definition of OpEx differs from the definition of operating expenditure applied in the Group's financial reporting.

To present the proportion of Taxonomy-eligible turnover, CapEx, and OpEx, the Benefit Systems Group used the methodology applied in the preparation of its financial statements, with the exception that, for the purposes of Taxonomy reporting, the definition of OpEx was aligned with the provisions of the EU Taxonomy.

In all other respects, the Group applied the following policies:

- Taxonomy disclosures were prepared in accordance with the principle of avoiding double counting,
- individual business areas were assigned to only one Taxonomy-eligible economic activity, and each portion of revenue, CapEx, and OpEx was recognised only once.

This ensures that the amounts included in the Taxonomy report have been disclosed only once.

No material changes were introduced to the EU Taxonomy reporting process compared to the previous reporting period, apart from the changes in eligibility described below.

For the purposes of Taxonomy disclosures, the Benefit Systems Group uses the same reporting currency as in its financial statements (Polish złoty, PLN).

Additional information

In its 2024 EU Taxonomy report, the Benefit Systems Group discloses – for the third consecutive year – the proportion of Taxonomy-aligned activities that make a substantial contribution to the objectives of climate change mitigation and climate change adaptation. This is the Group's second year of reporting on alignment with the remaining environmental objectives.

The Group is not active in and does not finance or have exposure to the activities referred to in sections 4.26–4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139, that is activities related to energy generation from nuclear processes and from gaseous fossil fuels.

Performance

Turnover

For the turnover KPI, the denominator represents the total consolidated revenue of the Group for 2024, as disclosed in the consolidated statement of profit or loss, presented in the consolidated financial statements of the Benefit Systems Group under 'Revenue'.

Categories of turnover generated by the Group in 2024 that qualify as Taxonomy-eligible under annexes to the delegated acts on environmental objectives, were identified as a result of the analysis conducted at the Group level.

The numerator includes the portion of the Group's net revenue that was identified as associated with Taxonomy-eligible and Taxonomy-aligned economic activities. No such activity was identified for the current reporting period

Assessment of compliance with the TSC

The Benefit Systems Group generates revenue primarily from the sale of non-pay employee benefits in the areas of sport and fitness, healthy lifestyles, physical recreation, well-being, culture, and entertainment, as well as tailored cafeteria programmes. The Group's main product, accounting for 81.9% of revenue in the reporting period, is the MultiSport Programme – sport cards sold to B2B customers (employers), allowing cardholders (employees) to access more than six thousand sports, fitness and recreational facilities in Poland and abroad. Another source of revenue for the Group is the operation of own fitness club networks, which accounts for 15.9% of the Group's total revenue.

As no Technical Screening Criteria have been established for these activities, they are not considered Taxonomy-eligible. Nonetheless, the activities of the Group are conducted with consideration for the advancement of sustainability objectives.

Among the Group's turnover, the activity 7.7 CCM Acquisition and ownership of buildings – revenue generated from property rental – was identified as Taxonomy-eligible.

An assessment of compliance with the Technical Screening Criteria was carried out for this activity. The assessment concluded that no revenue from this activity qualifies as Taxonomy-aligned..

Contribution to multiple objectives

Not applicable. No revenue associated with environmentally sustainable activities was identified.

Disaggregation of KPIs

Not applicable.

Contextual information

The numerator of the KPI does not include revenue associated with Taxonomy-aligned activities. No amounts associated with activities pursued for the Group's own internal consumption were reported under Taxonomy-eligible activities.

CapEx

As part of the Taxonomy alignment assessment, the Group reviewed its investment projects carried out in 2024.

For the purposes of calculating the CapEx KPI, the denominator includes additions to intangible assets, property, plant and equipment, and right-of-use assets, acquired, internally generated or resulting from the acquisition of control over other entities acquired by the Group during the reporting period. Some lease remeasurements due to contract modifications were included, amounting to a total of PLN 106,145 thousand. The numerator comprises a portion of capital expenditure as per Annex I to Commission Delegated Regulation (EU) 2021/2178.

Assessment of compliance with the TSC

The following activities conducted within the Group's investment processes were identified as Taxonomy-eligible:

- 6.5 CCM Transport by motorbikes, passenger cars and light commercial vehicles – leasing of vehicles within the corporate fleet,
- 7.2 CCM and 3.2 CE Renovation of existing buildings – expenditure related to building refurbishment,
- 7.3 CCM Installation, maintenance and repair of energy efficiency equipment – expenditure on energy-efficient equipment in fitness clubs,
- 7.7 CCM Acquisition and ownership of buildings – expenditure related to owned or leased buildings and premises,
- 8.1 CCM Data processing, hosting and related activities – expenditure on the Group's owned servers.

In this report, reflecting an evolving market practice, a broader scope of capital expenditure was considered eligible under activity 7.7 Acquisition and ownership of buildings, as compared with the previous year. This scope also includes CapEx related to leased properties used for operations. Column N-1 in the table below reflects this change, showing the capital expenditure for this activity in 2023.

An assessment of compliance with the Technical Screening Criteria was carried out for these activities. The assessment concluded that no capital expenditure associated with the identified activities qualifies as Taxonomy-aligned. The absence of Taxonomy-aligned activities was primarily due to challenges in obtaining documentation confirming compliance with the TSC..

Contribution to multiple objectives

Not applicable.

No capital expenditure associated with environmentally sustainable activities was identified.

Disaggregation of KPIs

Not applicable.

Contextual information

The numerator of the KPI does not include capital expenditure associated with Taxonomy-aligned activities. The Group does not have in place any CapEx plan referred to in section 1.1.2.2. of Annex I to Regulation (EU) 2021/2178.

OpEx

As part of the Taxonomy alignment assessment, the Benefit Systems Group analysed its operating expenditure incurred in 2024, as defined under the EU Taxonomy framework. The denominator of the OpEx KPI includes costs related to the day-to-day servicing of property, plant, and equipment (such as maintenance, repairs, inspections, cleaning, and security), as well as costs related to the lease of passenger vehicles.

Assessment of compliance with the TSC

The Group incurred operating expenditure associated with the following activities identified as Taxonomy-eligible:

- 6.5 CCM Transport by motorbikes, passenger cars and light commercial vehicles – leasing of vehicles within the corporate fleet,
- 7.2 CCM and 3.2 CE Renovation of existing buildings – expenditure related to building refurbishment and maintenance,
- 7.7. CCM Acquisition and ownership of buildings – costs related to owned or leased buildings and premises.

In this EU Taxonomy report, reflecting an evolving market practice, a broader scope of operating expenditure was considered eligible under activity 7.7 Acquisition and ownership of buildings, as compared with the previous year. This scope also includes OpEx related to leased properties used for operations. Column N-1 in the table below reflects this change, showing the operating expenditure for this activity in 2023.

An assessment of compliance with the Technical Screening Criteria was carried out for these activities. The assessment concluded that no operating expenditure associated with the identified activities qualifies as Taxonomy-aligned. The absence of Taxonomy-aligned activities was primarily due to challenges in obtaining documentation confirming compliance with the TSC.

Contribution to multiple objectives

Not applicable.

No operating expenditure associated with environmentally sustainable activities was identified.

Disaggregation of KPIs

Not applicable.

Contextual information

No operating expenditure associated with Taxonomy-aligned economic activities was included in the KPI numerator. The denominator includes expenditure related to building renovation, ongoing maintenance and repairs of buildings, short-term lease and maintenance of company vehicles, and other direct costs related to the day-to-day servicing of property, plant, and equipment by the Benefit Systems Group.

Nuclear and fossil gas related activities:

	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No

	Fossil gas related activities	
1.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
2.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
3.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

Turnover

Proportion of Taxonomy-aligned turnover of Benefit Systems Group in the financial year 2024

Financial year 2024	Year			Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")									
Economic activities (1)	Code (2)*	Turnover (3)	Proportion of Turnover (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy-aligned (A.1.) or Taxonomy-eligible economic activities (A.2.) Turnover, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
		PLN '000	%	Y; N; N/EL"	Y; N; N/EL"	Y; N; N/EL"	Y; N; N/EL"	Y; N; N/EL"	Y; N; N/EL"	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Acquisition and ownership of buildings	CCM 7.7	0	0,00%	N	N/EL	N/EL	N/EL	N/EL	N/EL								0,01%		
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%								0,01%		
Of which enabling		0	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%									E	
Of which transitional		0	0,00%	0,00%															Y
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Acquisition and ownership of buildings	CCM 7.7	5 217	0,15%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,19%		
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		5 217	0,15%	0,15%	0,00%	0,00%	0,00%	0,00%	0,00%								0,19%		
A. Turnover of Taxonomy-eligible activities (A.1+A.2)		5 217	0,15%	0,15%	0,00%	0,00%	0,00%	0,00%	0,00%								0,20%		
B. TAXONOMY NON-ELIGIBLE ECONOMIC ACTIVITIES																			
Turnover of Taxonomy-non-eligible activities		3 392 053	99,85%																
TOTAL		3 397 270	100,00%																

*The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Annex covering the objective, i.e.:
- climate change mitigation: CCM
- circular economy: CE

Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective
N – No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective
N/EL – Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective
EL – Taxonomy-eligible activity for the relevant environmental objective

	Proportion of turnover/Total turnover	
	Taxonomy-aligned per objective	**Taxonomy-eligible per objective**
CCM	0,00%	0,15%
CCA	0,00%	0,00%
WTR	0,00%	0,00%
CE	0,00%	0,00%
PPC	0,00%	0,00%
BIO	0,00%	0,00%

Capital expenditure (CapEx)

Proportion of Taxonomy-aligned capital expenditure (CapEx) of the Benefit Systems Group in the financial year 2024

Financial year 2024	Year			Substantial contribution criteria						"DNSH criteria ("Does Not Significantly Harm")									
Economic activities (1)	Code (2)*	CapEx (3)	Proportion of CapEx (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy-aligned (A.1.) or Taxonomy-eligible economic activities (A.2.)CapEx, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
		PLN '000	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3.	0	0,00%	N	N/EL	N/EL	N/EL	N/EL	N/EL									2,10%	E
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**0**	**0,00%**	**0,00%**	**0,00%**	**0,00%**	**0,00%**	**0,00%**	**0,00%**								**2,10%**		
Of which enabling		**0**	**0,00%**	**0,00%**	**0,00%**	**0,00%**	**0,00%**	**0,00%**	**0,00%**								**2,10%**	**E**	
Of which transitional		**0**	**0,00%**	**0,0%**															**Y**
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	9 511	1,23%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,94%		
Renovation of existing buildings	CCM 7.2. CE 3.2	82 347	10,63%	EL	N/EL	N/EL	N/EL	EL	N/EL								6,08%		
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3.	29 115	3,76%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,00%		
Acquisition and ownership of buildings	CCM 7.7	443 039	57,17%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								63,13%		
Data processing, hosting and related activities	CCM 8.1	304	0,04%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0,01%		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**564 316**	**72,82%**	**67,51%**	**0,00%**	**0,00%**	**0,00%**	**5,31%**	**0,00%**								**70,15%**		
A. CapEx of Taxonomy-eligible activities (A.1+A.2)		564 316	72,82%	67,51%	0,00%	0,00%	0,00%	5,31%	0,00%								**72,25%**		
B. TAXONOMY NON-ELIGIBLE ECONOMIC ACTIVITIES																			
CapEx of Taxonomy-non-eligible activities		**210 583**	**27,18%**																
TOTAL		**774 899**	**100,00%**																

*The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Annex covering the objective, i.e.:
-climate change mitigation: CCM
- circular economy: CE

Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective

N – No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective

N/EL – Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

EL – Taxonomy-eligible activity for the relevant environmental objective

	Proportion of CapEx/Total CapEx	
	Taxonomy-aligned per objective	**Taxonomy-eligible per objective**
CCM	0,00%	67,51%
CCA	0,00%	0,00%
WTR	0,00%	0,00%
CE	0,00%	5,31%
PPC	0,00%	0,00%
BIO	0,00%	0,00%

Operating expenditure (OpEx)

Proportion of Taxonomy-aligned operating expenditure (OpEx) of the Benefit Systems Group in the financial year 2024

Financial year 2024	Year			Substantial contribution criteria						"DNSH criteria ("Does Not Significantly Harm")									
Economic activities (1)	Code (2)*	OpEx (3)	Proportion of OpEx (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy-aligned (A.1.) or Taxonomy-eligible economic activities (A.2.) OpEx, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
		PLN '000	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**0**	**0,00%**	**0,00%**	**0,00%**	**0,00%**	**0,00%**	**0,00%**	**0,00%**								**0,00%**		
Of which enabling		**0**	**0,00%**	**0,00%**	**0,00%**	**0,00%**	**0,00%**	**0,00%**	**0,00%**									**E**	
Of which transitional		**0**	**0,00%**	**0,00%**															**Y**
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	1 287	2,55%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1,46%		
Renovation of existing buildings	CCM 7.2. CE 3.2	4 261	8,43%	EL	N/EL	N/EL	N/EL	EL	N/EL								4,52%		
Acquisition and ownership of buildings	CCM 7.7	42 591	84,25%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								70,36%		
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**48 139**	**95,23%**	**91,01%**	**0,00%**	**0,00%**	**0,00%**	**4,21%**	**0,00%**								**76,33%**		
A. OpEx of Taxonomy-eligible economic activities (A.1+A.2)		**48 139**	**95,23%**	**91,01%**	**0,00%**	**0,00%**	**0,00%**	**4,21%**	**0,00%**								**76,33%**		
B. TAXONOMY NON-ELIGIBLE ECONOMIC ACTIVITIES																			
OpEx of Taxonomy non-eligible economic activities		**2 414**	**4,77%**																
TOTAL		**50 553**	**100,00%**																

*The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Annex covering the objective, i.e.:

- climate change mitigation: CCM
- circular economy: CE

Y – Yes, Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective

N – No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective

N/EL – Not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

EL – Taxonomy-eligible activity for the relevant environmental objective

	Proportion of OpEx/Total OpEx	
	Taxonomy-aligned per objective	**Taxonomy-eligible per objective**
CCM	0,00%	91,01%
CCA	0,00%	0,00%
WTR	0,00%	0,00%
CE	0,00%	4,21%
PPC	0,00%	0,00%
BIO	0,00%	0,00%

ESRS E1

Climate change

E1-1

Transition plan for climate change mitigation

In 2024, the Group did not implement a transition plan for climate change mitigation. The organisation intends to develop such a plan but has not yet set a date for its adoption– a decision is expected in 2025. The Group is not excluded from the scope of EU Paris-aligned Benchmarks but has not established mitigation targets aligned with the objective of limiting global warming in line with the Paris Agreement.

E1 SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

In the second quarter of 2024, the Group conducted an assessment across its entire value chain. Due to limited traceability of raw materials and consumables used in the provision of services, the analysis focused on own operations and downstream value chain in Central and Eastern Europe, the Balkans, and Turkey. No material physical or transition risks were excluded from the assessment; all were considered in accordance with applicable scenarios, as described below. The Group has not yet performed a full climate resilience analysis of its strategy and business model. However, during the double materiality assessment, a climate scenario analysis was conducted, as outlined in the subsection 'General information' of 'IRO-1 Description of the process to identify and assess material impacts, risks and opportunities'.

In the 2024 sustainability reporting cycle, the Group has made use of the transitional provision allowing the omission of disclosures on anticipated financial effects, in accordance with the phased-in disclosure requirements.

Physical climate risks were determined based on climate hazards outlined in the high-emission IPCC SSP5-8.5 scenario, as presented in the IPCC report Climate Change 2021: The Physical Science Basis. The Group assessed the potential occurrence of events listed in ESRS AR 11, focusing on regions in Eastern, Central and Southeastern Europe, as well as Turkey.

Risks were identified related to potential supply chain disruptions or impediments to service delivery arising from climate hazards such as extreme temperatures and other weather events, and rising sea levels.

Furthermore, forecasts of wildfires, landslides, land subsidence and severe weather events indicated a potential for damage to assets owned by the Group or used across the value chain. In connection with these climate-related threats, risks were also identified regarding increased employee absenteeism – both in the form of general workday disruptions and more frequent instances of sick leave.

Climate transition risks and opportunities in the Group's own operations and value chain were identified based on the Net Zero Emissions by 2050 Scenario developed by the International Energy Agency. The analysis involved mapping the Group's activities onto a model consistent with this scenario. Key assumptions included increased awareness and demand for environmentally sustainable services among customers and other business partners, end-users and entities in the financial sector, the introduction of new and planned EU policies and strategic frameworks, and their implications for the Group's own operations. The assessment considered four categories of potential risks and opportunities:

- policy and legal,
- technological,
- market-related,
- reputational.

The Group primarily considers energy-related risks – namely, those associated with energy generation and its transmission to facilities – as material physical risks.

All risks were assessed across short-term (up to one year), medium-term (one to five years), and long-term (beyond five years) horizons. These horizons are aligned with the Group's overarching strategic planning framework. The undertaking has not set reduction targets nor initiated structured climate-related measures. Given the Group operates in the service sector, it perceives the only material challenge in adapting its current strategy to lie in its limited influence over property lessors with respect to energy and heat sourcing, their transition to low-emission models, and the related investment costs and reporting obligations. No need has been identified for the adaptation of the Group's products, services, or workforce. The Group has not identified the need to decommission any assets or improve access to financing for the upgrade of owned or leased facilities.

In conducting the climate resilience analysis of its strategy and business model, the Group relied on the following sources:

- Net Zero Emissions by 2050 scenario of the International Energy Agency (selected as the primary scenario due to its alignment with EU legislative objectives),
- TCFD Guidance on Scenario Analysis for Non-Financial Companies,
- IPCC Climate Change 2021: The Physical Science Basis.

Material climate-related impacts identified through the double materiality assessment:

Impacts
impact on climate change through greenhouse gas emissions.
impact on ozone layer depletion due to the use of refrigerants in building air conditioning systems.
impact on the consumption of natural resources through the use of energy (electricity, heat, and transport fuels) for operational purposes

Material climate-related risks identified through the double materiality assessment:

Risk	Risk category
Inclusion of commercial buildings in the EU Emissions Trading System (ETS) may increase heating costs for sports and fitness facilities.	Transition
Costs related to the required implementation of low-emission technologies, including those for heating, transport, and energy-efficient equipment.	Transition
Increased electricity costs due to energy shortages resulting from adverse weather conditions (high temperatures, etc.) or legislative developments, such as the introduction of additional charges.	Physical
Increased likelihood of extreme weather events, which may result in asset impairment (for example, damage to sports and fitness facilities), operational disruptions, or other adverse effects.	Physical
Operational disruptions at facilities due to adverse weather events, such as heatwaves necessitating temporary closures and preventing employees from performing their duties.	Physical

Material climate-related opportunity identified through the double materiality assessment:

- Reduced winter heating costs in Europe due to a declining heating degree days index.

E1-2

Policies related to climate change mitigation and adaptation

In 2024, the Group did not have a policy for the management of material impacts, risks and opportunities related to climate change mitigation. The absence of formal policies is attributable to the service-based nature of the Group's operations and its perception of primary impacts and dependencies as being predominantly within the social domain. Nevertheless, climate-related matters remain an area of focus for the organisation, primarily reflected in the monitoring of energy consumption and the implementation of measures aimed at its reduction. The Group plans to adopt a policy for the management of material impacts, risks and opportunities related to climate change mitigation in 2025.

E1-3

Actions and resources in relation to climate change policies

WIn the absence of an applicable policy in 2024 for the management of material impacts, risks and opportunities related to climate change mitigation, the Group did not allocate resources for the implementation of a potential action plan. The Group intends to undertake such actions in the medium term, following the adoption of the action plan. However, no decisions have yet been made regarding the specific measures to be implemented. As a result, it is currently not possible to identify the specific resources required for their execution. At present, the undertaking does not allocate resources to the implementation of climate policy-related actions.

E1-4

Targets related to climate change mitigation and adaptation

In 2024, the Group had no targets in place related to climate change mitigation or adaptation. The undertaking has not defined levels of ambition, does not monitor progress or the effectiveness of actions, and does not have targets in this area. The Group plans to define such targets within a timeline to be determined in 2025.

The Group did not have climate change mitigation and adaptation targets applicable in 2024. The entity does not currently have defined levels of ambition and does not monitor progress or performance or have targets in place. The Group will set these targets at a date to be determined in 2025

E1-5

Energy consumption and mix

The Group does not operate in high climate impact sectors. The undertaking assesses the severity of its impacts and evaluates the effectiveness of its actions by measuring energy consumption, including green energy, as well as by calculating its carbon footprint across all three scopes.

This is carried out using approved and recognised methodologies (GHG Protocol) for carbon footprint calculation. Invoices are the primary source of data. Some data has been estimated using the financial method. The calculations are based on data and emission factors from reputable sources, which have not been independently reviewed by external experts.

	Unit	Unit
Total energy consumption	89683,32	MWh
From fossil sources	77025,32	MWh
Share of fossil sources in total energy consumption	**85.9**	**%**
From nuclear sources	0	MWh
Total renewable energy consumption	12,658	MWh
Share of renewable sources in total energy consumption	**14.1**	**%**
biomass	0	MWh
biofuels	0	MWh
biogas	0	MWh
nenewable hydrogen	0	MWh
renewable electricity	12,658	MWh
renewable heat	0	MWh
renewable steam	0	MWh
renewable cooling	0	MWh
self-generated energy	0	MWh

E1-6

Gross Scopes 1, 2, 3 and total GHG emissions

The tables below present the results of the carbon footprint assessment across individual categories, with a breakdown into Scope 1, 2 and 3 emissions. Final figures and definitive values are provided in Table 1. The remaining tables serve a supporting function. A detailed description of the methodology is provided further on in this section.

The calculations were prepared in accordance with the ESRS and the GHG Protocol, and cover all three scopes. Emission sources and corresponding emission factors, obtained from reputable sources, were taken into account.

Where data were unavailable, values were extrapolated. Monetary emission factors were applied instead of physical ones where necessary. The data used for the calculations were sourced, among others, from purchase invoices and accounting records.

Table 1. The GHG emissions in 2024 have been compiled using location-based and market-based approaches. A detailed disaggregation of Scope 3 emissions into specific categories is presented and total GHG emissions for the organisation are provided.

Table 2. GHG emission intensity - the summary presents the value of emission intensities determined using location-based and market-based approaches.

Table 3. Sources of data and indicators - the summary presents the sources of data and emission indicators for each category.

Table 4. Completeness of carbon footprint estimation - the table provides a summary of the scope of the emissions estimation and the identification of emissions that are optional or not included as a standard under the GHG Protocol methodology.

Table 1. The GHG emissions in 2024

	Unit	Baseline year (2024)
Scope 1 GHG emissions		
Gross Scope 1 GHG emissions	Mg CO_2e	2087,64
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	%	0
Petrol	Mg CO_2e	448,79
Diesel	Mg CO_2e	103,02
Natural gas	Mg CO_2e	1535,84
Scope 2 GHG emissions		
Gross location-based Scope 2 GHG emissions	Mg CO_2e	36605,70
Gross market-based Scope 2 GHG emissions	Mg CO_2e	38566,47
Scope 3 GHG emissions		
Total gross indirect Scope 3 GHG emissions	Mg CO_2e	276833,04
1 Purchased goods and services	Mg CO_2e	4700,47
2 Capital goods	Mg CO_2e	35489,63
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	Mg CO_2e	14300,99
4 Upstream transport and distribution	Mg CO_2e	56,04
5 Waste generated in operations	Mg CO_2e	410,97
6 Business travel	Mg CO_2e	400,34
7 Employee commuting	Mg CO_2e	5412,89
8 Upstream leased assets	Mg CO_2e	not applicable
9 Downstream transportation	Mg CO_2e	not applicable
10 Processing of sold products	Mg CO_2e	not applicable
11 Use of sold products	Mg CO_2e	215838,12
12 End-of-life treatment of sold products	Mg CO_2e	223,59
13 Downstream leased assets	Mg CO_2e	not applicable
14 Franchises	Mg CO_2e	not applicable
15 Investments	Mg CO_2e	not applicable
Total Greenhouse Gas Emissions*		
Total greenhouse gas emissions in Scopes 1+2 (location-based) + 3	Mg CO_2e	315526,39
Total greenhouse gas emissions in Scopes 1+2 (market-based) + 3	Mg CO_2e	317487,15

In accordance with the requirements of the ESRS standard, the following table shows the GHG intensity of the Group's net revenues (Note 5 in the Group's 2024 consolidated financial statements). The calculation was performed by dividing the total net revenue by the total GHG emissions determined according to the location-based and market-based method.

Table 2. Greenhouse gas emission intensity

Net revenues [Thousands of PLN]	3 397 270
Emission intensity (location-based) [tCO2e/MPLN]	92,88
Emission intensity (market-based) [tCO2e/MPLN]	93,45

Methodology

The calculation methodology covers Scope 1, 2 and 3 emissions. All calculations were carried out in accordance with the GHG Protocol guidelines, ensuring consistency with internationally recognised standards for greenhouse gas emissions reporting.

The calculations include the following emission scopes:

- **Scope 1** – direct emissions from assets such as offices, fitness clubs, and the vehicle fleet.
- **Scope 2** – indirect emissions from purchased electricity, heat, cooling or steam.
- **Scope 3** – other indirect emissions, including but not limited to the procurement of raw materials, capital goods, waste management, transport, employee commuting, business travel, and the use of sold products.

The analysis covers the accounting period from 1 January to 31 December 2024. The baseline year for calculations is 2024, enabling consistency and comparability of data in future reporting cycles. The calculation boundary covers the entire Group, subject to the exceptions described below.

The methodology for calculating the Scope 3 carbon footprint for 2024 is based on the application of a standard emissions formula where:

$$\boxed{c\_f = \sum f\_i{,}j \; a\_i \; g\_j}$$

- **f_i,j** represents the emission factor for a given activity (a_i) and greenhouse gas (g_j),
- **a_i** represents the activity (fossil fuel combustion, raw material consumption, etc.),
- **g_j** represents the global warming potential of the respective greenhouse gas.

Given that most Scope 3 emission factors are expressed in kilogrammes or tonnes of carbon dioxide equivalent (kgCO2e or tCO2e), the formula is simplified as follows:

$$\boxed{c\_f = \sum f\_i \; a\_i}$$

In the calculation of CO2e emissions, the Group applies the most recent Global Warming Potential (GWP) values published by the IPCC, based on a 100-year time horizon. These GWP values are applied to Scope 1 and 2 emissions, as well as the majority of Scope 3 emissions. An exception applies to monetary factors, for which values from AR5 were used.

The calculations were based on the operational control approach (irrespective of ownership share), in alignment with ESRS requirements. The ESRS requirements are inconsistent with those of the GHG Protocol due to a different approach to temporal boundaries (it is necessary to account for the emissions of a subsidiary under operational control regardless of the duration of control).

Organisational boundaries and emission scopes

The Group's emissions have been calculated for the parent company and subsidiaries in accordance with the following assumptions:

This report covers the following companies:

- Benefit Systems S.A., including the Fitness Branch,
- Vanity Style Sp. z o.o.,
- Benefit Systems International S.A.
- FIT Invest International Sp. z o.o.
- Form Factory s.r.o. (CZ)
- Next Level Fitness OOD (BG)

Emissions for other Group companies were calculated on the basis of specific data, using extrapolation according to the method described in this chapter.

On the basis of the estimated emissions, associated companies were excluded due to the immaterial scale of activities and emissions (to estimate emissions, a factor was used based on the group's own emissions in Scopes 1 and 2 and Cat. 11 of Scope 3 for activities in Poland with a value of approximately 70 tCO2e.

The total emissions of the listed companies were less than 1%):

- Get-Fit Katowice II Sp. z o.o. – revenue for 2024 amounted to PLN 3,085,828.80. At a 20% ownership interest, this represents approximately 44 tCO2e, significantly below the 1% threshold.
- Instytut Rozwoju Fitness Sp. z o.o. – revenue for 2024 totalled PLN 26,393,595.05. At a 48% ownership interest, this represents 895.07 tCO2e, well below 1% of total Group emissions.
- Calypso Fitness S.A. – revenue for 2024 amounted to PLN 47,458 thousand. At a 33% ownership interest, this represents 1,106.47 tCO2e, significantly below 1% of Group-wide emissions.

The Group includes all 15 Scope 3 emission categories. However, certain categories have been assessed as immaterial in accordance with the ESRS methodology and are reviewed at least once every three years. Calculations were based on GWP100 values consistent with IPCC AR6, except for monetary emission factors, which were derived from AR5.

Following an operational review, all categories were assessed, and the following were identified as applicable:

- Category 1 – Purchased goods and services,
- Category 2 – Capital goods,
- Category 3 – Fuel- and energy-related activities (not included in Scope 1 or 2),
- Category 4 – Upstream transport and distribution,
- Category 5 – Waste generated in operations,
- Category 6 – Business travel,
- Category 7 – Employee commuting,
- Category 9 – Downstream transport and distribution,
- Category 11 – Use of sold products,
- Category 12 – End-of-life treatment of sold products.

The remaining categories were excluded due to the absence of activities that could result in emissions in those categories (for example, no emissions are generated during the use phase), and are therefore not subject to reporting (Categories 8, 10, 13, and 14). Due to the exclusion of associates, Category 15 was also excluded from the calculations (representing approximately 0.6% of the Group's total emissions). No refrigerant leaks were identified under Scope 1.

Emission factors and data sources

The data used to calculate greenhouse gas emissions were sourced from various inputs depending on the emission scope. The primary input data consisted of actual figures, including purchase invoices, accounting records, corporate data management systems, operational data, and employee surveys in the case of transport and travel-related information.

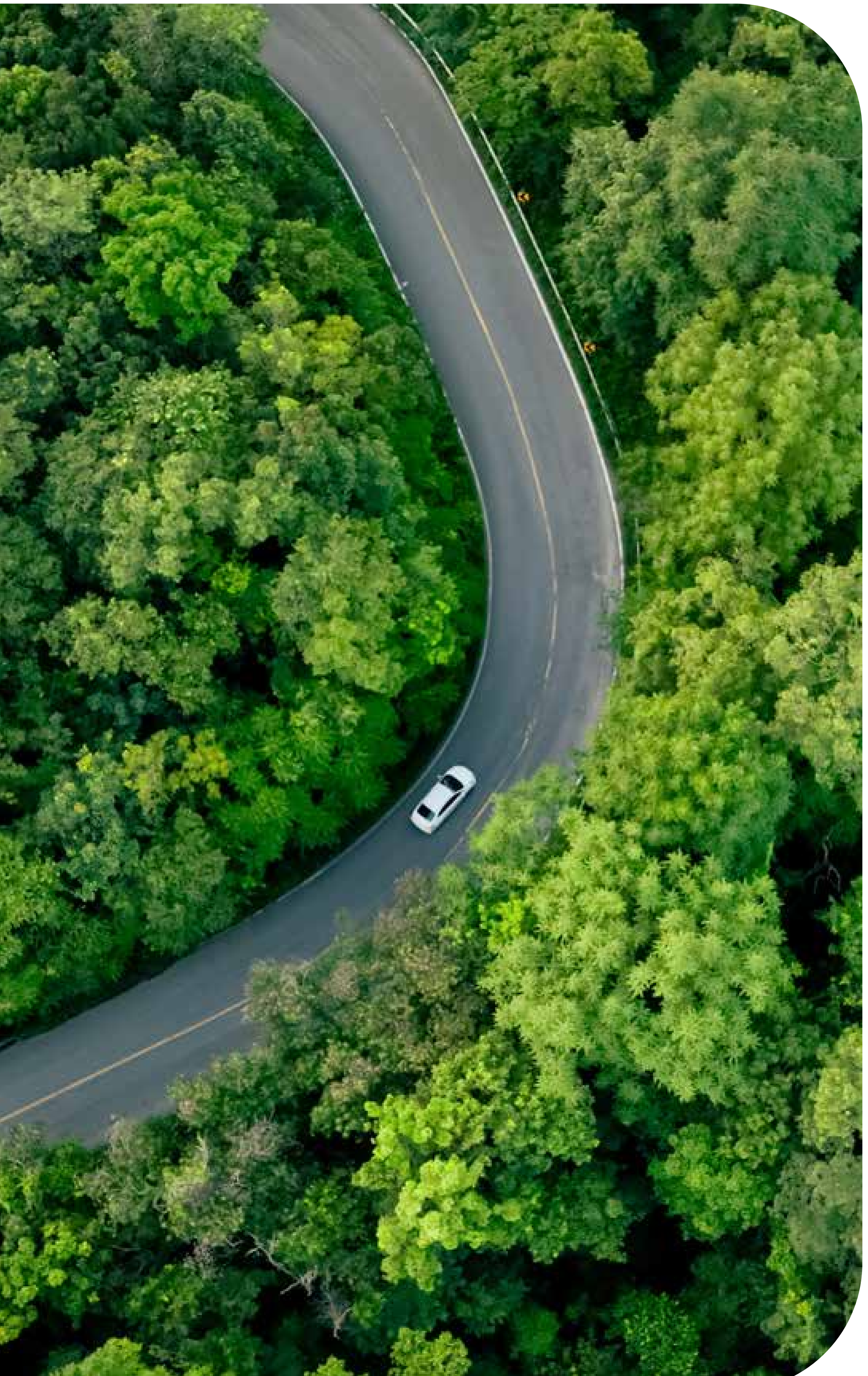
The table below lists the sources of emission factors used in the process for Scope 1, 2 and 3 emissions. Abbreviated document titles are used in the table:

- KOBIZE – 2023 emission factors for electricity, published in December 2024,
- DEFRA – Greenhouse gas reporting: conversion factors, July 2024,
- AIB – European Residual Mixes: Results of the calculation of Residual Mixes for the calendar year 2023, May 2024,
- URE – Heating industry figures for 2023, URE, January 2025,
- EPA – EPA 2025 GHG Emission Factors Hub, January 2025,
- Ecoinvent 3.11,
- Exiobase 3.8.

All data and emission factors were adjusted to reflect Polish economic and energy market conditions, taking into account exchange rate fluctuations and inflation.

Table 3. Factors and data sources

Scope/Category	Data sources	Databases
Scope 1	Extracts from internal systems showing consumption of liquid, solid and gaseous fuels. Refrigerant leaks. Expenditure on natural gas purchases	DEFRA 2024
Scope 2	Extracts from internal systems covering electricity, heating and cooling consumption (physical and financial data)	Location-based: KOBIZE (December 2024) Market-based: AIB (May 2024)
Category 1: Purchased goods and services	Extracts from internal systems covering the weights of raw materials purchased. Extracts from the accounting system covering individual services and other expenses that are not raw materials	Goods: Ecoinvent 3.11 (physical factors), Exiobase 3.8 (monetary factors). Services: Exiobase 3.8 (monetary factors by service type).
Category 2: Capital goods	List of expenditures for individual investments and fixed assets	Exiobase 3.8 (monetary factors by investment type).
Category 3: Fuel and energy-related activities	Data for Scope 1 and 2 emissions, including energy distributed to other entities	DEFRA (July 2024), AIB (May 2024), KOBIZE (December 2024), URE
Category 4: Upstream transport and distribution	Data on purchased raw materials, transport distances and transport modes	Ecoinvent 3.11, DEFRA (July 2024)



Scope/Category	Data sources	Databases
Category 5: Waste generated in operations	Estimates of generated waste volumes	DEFRA (July 2024), Teraz Środowisko statistics
Category 6: Business travel	Extracts from the corporate travel management system	DEFRA (July 2024)
Category 7: Employee commuting	Employee survey responses	DEFRA (July 2024)
Category 9: Downstream transport and distribution	Data on transport distances by raw material type	Ecoinvent 3.11.
Category 11: Use of sold products	Data on electricity, heat and natural gas consumption by company-owned and partner-operated facilities	DEFRA (July 2024), KOBIZE (December 2024)
Category 12: End-of-life treatment of sold products	National statistical data	EPA emission factors for PET bottle recycling.

Data extrapolation

The table below shows the share of each scope and category in the total carbon footprint, as well as the extrapolation factors and how they were determined. The percentage of activity coverage is understood as the share of emissions that were determined on the basis of actual data, confirmed by invoices (purchase of fuels, energy, materials), for which it was reasonable to select emission factors.

Table 4. Completeness of carbon footprint estimation

Scope	Category	Share of Scope 3 [%]	Share of total [%]	Percentage of activities covered in calculations [%]	Volume used for extrapolation
Scope 1	Direct emissions from own operations		0.9%	95.4%	Share of own clubs included in the calculation, indicator was determined on the basis of quarterly changes in the number of clubs
Scope 2	Indirect emissions from purchased energy		13.2%	95.4%	Share of Own Cost of Sales of companies included in the calculation using actual data
Scope 3	Category 1: Purchased goods and services	2.4%	2.0%	Physical data: 61.4%, Monetary data: 71.1%, services: 71.1%	Share of Own Sales Costs of the companies included in the calculations using actual data. Share of the mass of goods purchased for which indicators were selected.
Scope 3	Category 2: Capital goods	11.2%	9.6%	Physical data:55%, Monetary data:55%	Share of expenditure on Fixed Assets in the Polish companies included in the calculation using actual data.
Scope 3	Category 3: Fuel- and energy-related activities	6%	5.2%	95.4%	Share of own clubs included in the calculation, the indicator was determined on the basis of quarterly changes in the number of clubs
Scope 3	Category 4: Upstream transport and distribution	0%	0%	71.1%	Share of own clubs included in the calculation, the indicator was determined on the basis of quarterly changes in the number of clubs
Scope 3	Category 5: Waste generated in operations	0.2%	0.1%	71.1%	Share of own clubs included in the calculation, the indicator was determined on the basis of quarterly changes in the number of clubs
Scope 3	Category 6: Business travel	0.1%	0.1%	71.1%	Share of own clubs included in the calculation, the indicator was determined on the basis of quarterly changes in the number of clubs
Scope 3	Category 7: Employee commuting	2.0%	1.7%	8.7% (Number of employees: 8854)	Share of employees who completed the survey in the pool of all employees
Scope 3	Category 11: Use of sold products	78%	67%	77.9%	Share of partner clubs included in the calculation
Scope 3	Category 12: End-of-life treatment of sold products	0.1%	0.1%	71.1%	Share of Own Cost of Sales of companies included in the calculation using actual data
Scope 3	Category 12: End-of-life treatment of sold products	0.1%	0.1%	71.1%	Share of Own Cost of Sales of companies included in the calculation using actual data

Approach to data extrapolation and reporting

Under the market-based approach to Scope 2 emissions reporting, the Group considers the percentage of energy purchased under contractual instruments such as guarantees of origin.

Guarantees of origin accounted for 16.17% of Scope 2 emissions related to activities in Poland, including Next Level Fitness OOD (BG) and Form Factory s.r.o. (CZ).

The Group has no bundled certificates (purchased electricity bundled with instruments such as a guarantee of origin or renewable energy certificates). 100% of the purchased energy is sourced from the market and guarantees of origin of electricity are purchased on the Polish Power Exchange (Towarowa Giełda Energii).

The Group discloses how Scope 3 emissions are measured based on data from specific segments of the value chain - upstream (before the service/ product is created) and downstream (at later stages of the product/service lifecycle).

Primary data from suppliers and value chain partners accounted for less than 0.01% of all Scope 3 calculations and related only to cloud services.

The group includes all 15 Scope 3 emission categories, some of which have been identified as immaterial according to the ESRS methodology. These are recalculated at least once every 3 years.

Data comparability and recalculation policy

The first reporting year in which the Group has aligned its disclosures with the ESRS, necessitating adjustments to the calculation methodology and the GHG emissions consolidation criteria. In previous years, the Benefit Systems Group calculated its carbon footprint in line with the GHG Protocol. However, the Scope 3 carbon footprint was not comprehensively calculated.

As Scope 3 is fully included as of 2024, and due to the methodological changes introduced, the comparability of GHG emissions between 2023 and 2024 is limited. Moreover, the Group's expansion driven by the acquisition of new facilities means that historical data cannot be directly compared with current results. Where material changes occur in the definition of the reporting entity or its value chain, the undertaking must disclose those changes and explain their impact on the year-on-year comparability of GHG emissions.

The Group has adopted a baseline year recalculation policy, under which recalculation is required where projected emission changes exceed 5%. Material changes in emissions that may trigger a recalculation include:

- changes in organisational structure, such as acquisitions, divestitures, or organisational restructuring,
- outsourcing or insourcing of emission-generating activities,
- modifications to the methodology for calculating the carbon footprint, improvements in the accuracy of emission factors, or refinement of activity data,
- improvement in the accuracy of emission factors, particularly in relation to market-based energy footprint calculations,
- identification of significant errors in prior calculations.

Methodological limitations

Despite the precise methodology, some calculation limitations arise from the level of data availability as well as from scientific uncertainty (properties of the coefficients used) and estimation. Data for the part of foreign companies were extrapolated from the activities of other Polish companies, which was necessary due to incomplete information. For some Scope 3 categories, monetary factors were used instead of physical ones, especially for services and capital goods.

Emissions and emissions intensity data was not subject to independent verification by an external assurance provider.

E1-8

Internal carbon pricing

As an undertaking operating in the services sector, which is not a high-emission sector, the Group does not apply internal carbon pricing mechanisms.

ESRS E3

Water and marine resources

Material water and marine resources-related impact identified through the double materiality assessment:

- Impact on water availability due to increased water stress.

Material water and marine resources-related risk identified through the double materiality assessment:

- Water use restrictions that may result in water shortages at own or partner-operated facilities, thereby limiting the availability of the Group's services.

No material opportunities related to water and marine resources were identified in the double materiality assessment.

E3-1

Policies related to water and marine resources

The Group had no policies related to water and marine resources in place in 2024. Operating in the services sector, the Group focused on the social aspects of its business and undertook only limited water-saving measures within its own facilities. In 2024, it carried out an assessment of its environmental impacts and dependencies, including those related to water. The timeline for adopting water-related policies is expected to be established in 2025. regulacji związanych z zasobami wodnymi zostanie ustanowiony w 2025 roku.

E3-2

Actions and resources related to water and marine resources

In 2024, the Group had no action plan in place relating to water and marine resources. Operating in the services sector, the Group focused on the social aspects of its business and undertook only limited water-saving measures within its own facilities. The outcomes of the assessment will inform the development of a strategy incorporating relevant action plans.

E3-3

Targets related to water and marine resources

In 2024, the Group had no water or resources-related targets in place. The Group is currently developing its approach in this area and analysing the implications of its dependencies on water and marine resources. Only upon completion of this process does the Group intend to decide whether to establish targets in 2025. Accordingly, it has not yet defined measurable ambitions or designated a baseline year.

E3-4

Water consumption

The double materiality assessment identified water-related impacts associated with water withdrawal for operational and sanitary purposes. No material impacts, risks or opportunities were identified in relation to marine resources. The Group does not store, retain, or recycle water. It is assumed that 100% of the water withdrawn is equal to the amount discharged. For facilities located in Poland, approximately 80% of water withdrawal and discharge data is based on direct measurement from water meters or invoices. The remaining 20% is estimated by interpolation, using reference data from facilities of similar or identical floor area.

For foreign facilities, all data has been estimated using a water use intensity ratio derived from Polish operations, amounting to 1.5 m^3 per square metre of fitness club floor area. Due to its decentralised business model and the presence of numerous indirect intake points, the Group is currently unable to identify whether any of its water withdrawal occurs in areas of high-water stress, nor can it precisely determine the quality or quantity of water in the catchments supplying its operations.

Estimated data are not subject to oversight, whereas data obtained from meters or invoices are verified by supervisory authorities in accordance with applicable regulations. At no stage are the presented data additionally verified by other parties.

Water consumption

	Value	Unit
Water withdrawals, including:	625 797	m3
Actual data	408 393	m3
Estimated data	217 404	m3
Water discharges, including:	625 797	m3
Actual data	408 393	m3
Estimated data	217 404	m3

To calculate water intensity, net revenue of Thousands of PLN 3,397,270 was used (Note 5 in the Group's 2024 consolidated financial statements). This amount was divided by the total volume of water withdrawn, amounting to 625,797 m^3, resulting in a water intensity of 184.22 m^3 per PLN million of net revenue, or 769 m^3 per EUR million when converted at an exchange rate of PLN 4.17/EUR

ESRS 5

Resource use and circular economy

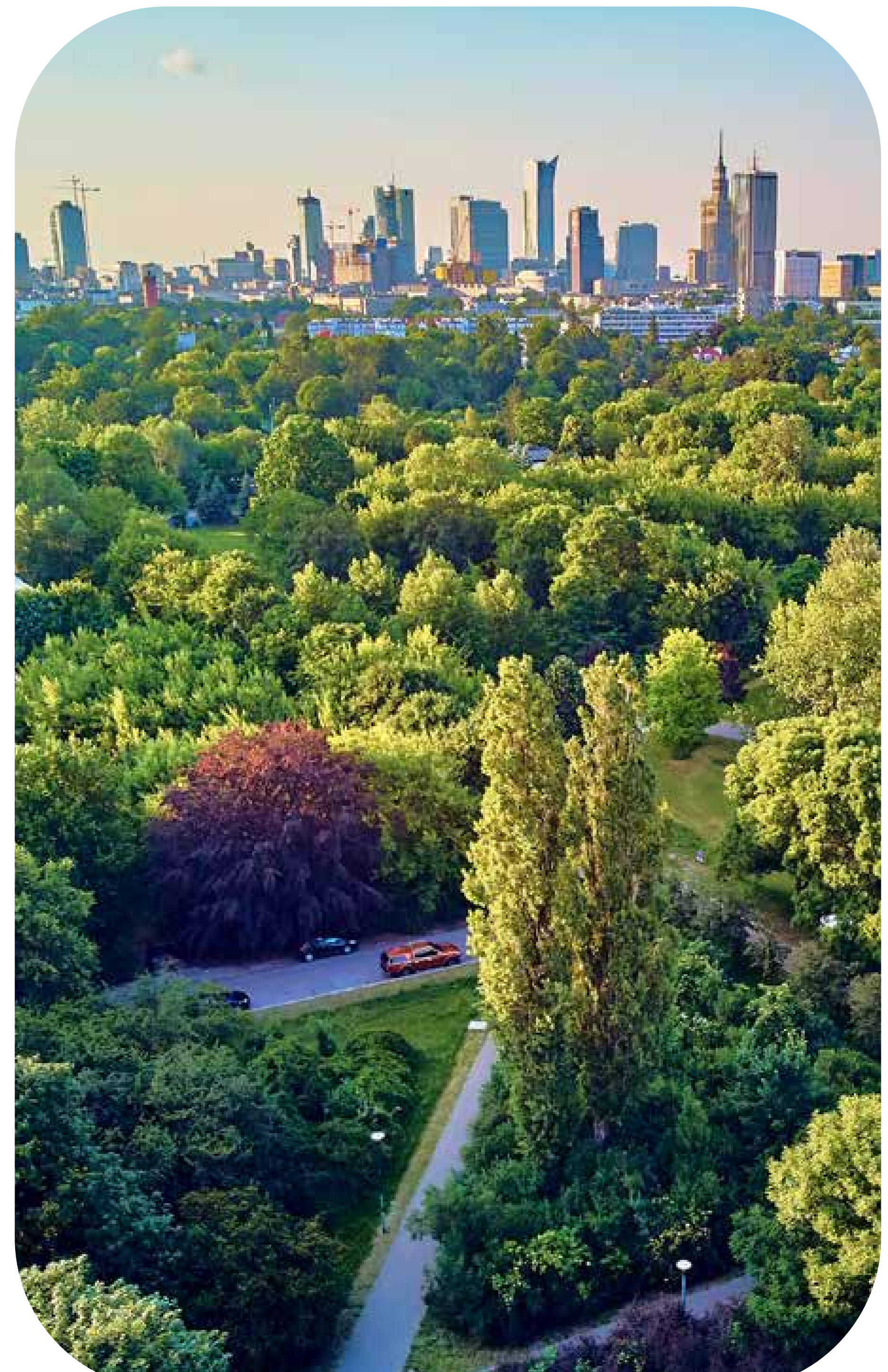
Material impacts identified through the double materiality assessment:

- Impact on the depletion of natural resources due to the extensive use of materials for facility fit-out and equipment,
- Environmental impact resulting from the use, distribution, and sale of hard-to-recycle materials and products, such as promotional items, plastic membership cards, and food and workout supplements packaged in single-use containers, some of which are difficult to recycle,
- Potential impact on the volume of municipal waste released into the environment, due to waste generation and improper sorting by employees and users.

Material opportunity identified through the double materiality assessment:

- Implementing waste management practices that enable selective waste collection and recycling. This may include the use of appropriate recycling bins and the sale of products in recyclable mono-material packaging.

No material risks related to circular economy were identified during the double materiality assessment.



E5-1

Policies related to resource use and circular economy

In 2024, the Group had no policies in place regarding resource use and circular economy. So far, the Benefit Systems Group has focused on social policies and initiatives, and therefore no dedicated circular economy policies have been established. The Group has followed a general principle of prudent resource management, favouring repairs (where feasible and permitted by safety regulations) over the procurement of new items of property, plant and equipment.

E5-2

Actions and resources related to resource use and circular economy

So far, the Benefit Systems Group has focused on social policies and initiatives, and therefore no dedicated circular economy policies have been established. The year 2024 marked the first time the Group conducted an assessment of its impacts related to circular economy. The outcomes of the assessment will inform the development of a strategy incorporating relevant action plans.

At present, the Group is progressively implementing measures to optimise resource use and waste management, thereby supporting the principles of circular economy. Existing initiatives focus on minimising material waste and maximising the reuse of materials. Considering resource inflows, including their utilisation, resource outflows linked to products and services, and waste generation, the Group undertakes the following actions:

- Promoting the reuse of products and resources – the Group has introduced a practice of reselling replaced sports equipment and finishing materials, thereby extending their lifecycle and reducing waste generation,
- Sustainable selection of office materials – in the interest of responsible resource use, the Parent primarily uses recycled printer paper and rechargeable batteries, eliminating the need for single-use AA and AAA batteries,
- Use of recycled materials – particularly in upgraded and newly established fitness clubs, including the use of partially refurbished equipment and machines, which contributes to the reduction of virgin raw material consumption and waste.

E5-3

Targets related to resource use and circular economy

The Group has not established formal, measurable targets in relation to resource use and circular economy, nor has it adopted qualitative or quantitative metrics to assess progress in achieving such targets and implementing related actions. The year 2024 marked the first time a resource use and circular economy assessment was conducted, representing a key milestone in the process of identifying impacts and, at the same time, the reason why targets have not yet been defined. The Group is currently assessing the consequences of the identified impacts and will determine the timing for setting relevant targets in 2025

E5-4

Resource inflows

The analysis of material impacts, risks and opportunities (IRO), identified a material impact related to resource use, stemming from the fit-out and furnishing of sports and fitness facilities and the consumption of office materials, primarily paper. As the Group does not engage in manufacturing activities, it does not report detailed qualitative or quantitative data in this area.

The Group considers the following to be material resource inflows: paper, equipment, fit-out materials, and fitness machines used in fitness clubs. The Group follows two procurement pathways for sports and fitness equipment:

- the purchase of new equipment,
- the purchase of refurbished equipment from other fitness networks.

As a general rule, the Group fits out fitness club interiors with new materials. However, recycled raw materials may be used in their production – for example, rubber flooring made from processed rubber waste.

The Group does not consider critical raw materials or rare earth elements to constitute material resource inflows within its operations.

E5-5

Resource outflows

The Group identifies impacts in this area related to the generation of significant volumes of waste that are difficult to recycle. These impacts have been addressed by establishing conditions that enable selective waste collection, thereby mitigating negative environmental impacts and reducing associated costs. At the same time, the Group's operations are service-based rather than manufacturing-oriented, meaning it does not operate production facilities nor utilise materials or products that are key in industrial processes. As such, circular economy principles related to product design for durability, reusability, repairability, disassembly, or recyclability do not apply to the Group's operations. Given the Group's business profile and the non-material-intensive nature of its services, this disclosure is not applicable to its operations.

The Group, operating under a decentralised business model, conducts its operations through leased premises. The Group does not have direct access to data on waste generated in the course of its operations, as such waste is managed by the lessor. Accordingly, all data has been estimated based on literature sources (Szpadt, R., & Jędrczak, A. (2006). Określenie metodyki badań składu sitowego, morfologicznego i chemicznego odpadów komunalnych. Kamieniec Wrocławski, Zielona Góra, 110 pp.) and predefined assumptions.

It was assumed that the Group's operations generate waste classified under code 20 03 01 – unsorted (mixed) municipal waste. No other waste types were included in the estimates. A bulk density of 0.103 Mg/m^3 was applied, with weekly waste collection assumed per site. For every 1,000 m^2 of facility space, one 1,100-litre container was assumed, filled to 80% at the time of collection. As the Group does not possess detailed data on waste disposal, this component was estimated based on data published by Statistics Poland (GUS). It was assumed that no waste was generated in Turkey due to the absence of significant operational activities in that country (0 owned facilities). An exception to the methodology described above applies to the Group's central office, where data was sourced directly from the BDO waste database system.

Estimates were derived from recognised sources and were not subject to independent verification by external experts. Actual data is monitored by the Environmental Inspectorate in Poland and its counterparts in other countries.

Total amount of waste

Description	Amount (2024)	Unit
Total amount of waste generated	2,057.71	tonnes
Total amount of waste diverted from disposal	1,257.26	tonnes
Total amount of waste diverted from disposal	61.10	%
Total amount of waste directed to disposal	800.45	tonnes
Total amount of waste directed to disposal	38.90	%

Total amount of waste diverted from or directed to disposal

Total amount of waste diverted from disposal	Amount	Total amount of waste directed to disposal	Amount
	Tonnes		Tonnes
Non-hazardous	1,257.26	Non-hazardous	800,45
Preparation for reuse	0,00	Incineration	16,46
Recycling	549,41	Landfill	783,99
Other recovery (energy recovery)	707, 85	Other	0,00

03.

Society

ESRS S1

Own workforce

S1 SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

The Benefit Systems Group includes within the scope of its sustainability reporting all individuals within its own workforce who may be materially affected, namely:

- **employees** – all individuals employed under an employment relationship within the Group's companies,
- **associates** – individuals who are not employees but perform tasks or provide services under B2B contracts or civil-law agreements. The applicable policies and internal regulations governing the Group's own workforce are, as far as possible, applied uniformly, taking into account differences arising from the legal form of engagement. Associates are subject to these policies and regulations to the extent permitted by applicable law and the business model – for example, in the context of access to benefits offered by the Group.

The double materiality assessment identified material actual and potential impacts, risks and opportunities related to own workforce.

Identified impacts

Area	Description of impact	Nature of impact
Secure employment	Impact on employment security, potentially leading to reduced employment stability, resulting from the use of civil-law or B2B contracts to engage associates at sports and fitness facilities.	Actual negative
Training and skills development	Impact on the development of associates through support provided to trainers and instructors at sports and fitness facilities in enhancing the knowledge and competencies necessary for the performance of their roles.	Actual positive
Occupational health and safety	Impact on the safety and health of employees and associates through procedures implemented at sports and fitness facilities.	Actual positive
Occupational health and safety	Potential impact on the health and safety of employees and associates due to the nature of their roles and working conditions, which may increase the likelihood of accidents or other adverse events associated with the performance of duties in sports and fitness facilities.	Potential negative
Occupational health and safety	Potential impact on the safety and health of employees and associates at sports and fitness facilities resulting from the direct or indirect delegation of tasks that may exceed their competencies or fall outside their defined responsibilities.	Potential negative
Work-life balance	Potential impact on the work-life balance of employees and associates at sports and fitness facilities due to frequent scheduling changes, insufficient time for consultation when such changes are introduced, and the incomplete implementation of dedicated communication tools (including the use of social media, which may not be universally accepted).	Potential negative
Work-life balance	Potential impact on the work-life balance of employees and associates at sports and fitness facilities due to the incomplete implementation of dedicated communication tools (including the use of social media, which may not be universally accepted).	Potential negative

Identified workforce-related risk:	
Area	**Risk description**
Other work-related rights	The Group may be exposed to the risk of breaches of employees' and non-employees' right to privacy, particularly in relation to personal data protection and information security. Data breaches may lead to unauthorised access to sensitive information, such as HR data, and may result in legal, financial and reputational consequences.

Identified workforce-related opportunities:	
Area	**Opportunity description**
Training and skills development	Investing in the development of employees and associates, leading to increased operational efficiency and service quality, thereby strengthening the Group's competitiveness.

The impacts, risks and opportunities outlined in this section are closely tied to the specific characteristics of the fitness industry and the operational model of the Benefit Systems Group.

In addition to offering employers innovative solutions such as the MultiSport card, as well as the MultiLife and MyBenefit programmes, the Group also operates a network of owned fitness clubs. Responsible fitness club management and a strong focus on occupational safety and health, are integral to the Group's operations and are reflected in the objectives and initiatives described in this section.

Currently, the effects of these impacts, risks and opportunities do not require fundamental changes to the business model, but they highlight the need to further strengthen the management of selected topics.

The double materiality assessment did not identify any risks associated with forced labour or child labour within the Group's own operations. The Group complies with applicable labour legislation, including regulations concerning the employment of minors, in all countries where it operates. Furthermore, under the IRO assessment, areas such as social dialogue, diversity, adequate wages, pay gap, and social protection were not considered material. Nevertheless, these areas continue to be monitored and addressed as part of the Group's ongoing commitment to continuous improvement and compliance with applicable standards.

The Group companies have a positive impact on employees and associates through the actions described in section S1-4.

Due to the absence of a formally adopted climate transition plan, the Group does not report information on its impact on own workforce.

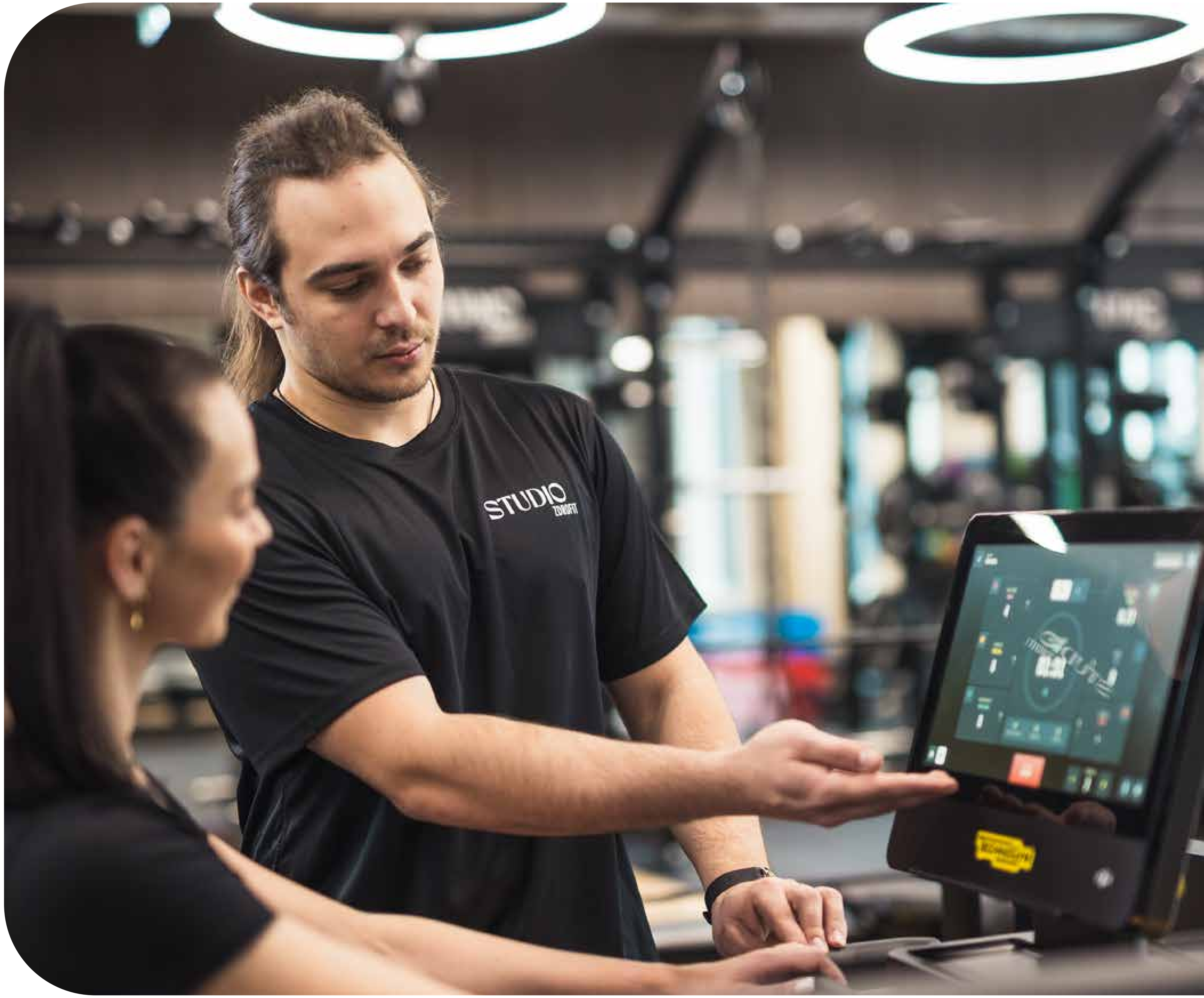
S1-1

Policies related to own workforce

The Group's strategic approach to responsible management is outlined in the ESG Strategy for 2024–2026 under the Society pillar, across the following priorities:

- Activity and engagement
  - We activate and engage
- Well-being and education
  - We support well-being
  - We respect diversity
  - We share knowledge

The Group has not implemented formal, uniform, and consistent HR policies, rules, or procedures addressing the management of impacts, risks, and opportunities related to its own workforce across all Group companies. However, a number of workforce-related policies, internal rules, and procedures are in place at the level of individual companies within the Group, and are aligned with the material matters identified.



Material impact identified during the double materiality assessment	Regulations addressing the impact	Scope of regulation	Key content of regulation	Responsibility
Training and skills development	Planning and implementing training activities	Parent, covering employees and associates	Defines the rules for planning and implementing training activities, the training budget, and the organisation of internal and external training sessions.	HR Director/HR and Administration Director
Occupational health and safety	A set of OHS procedures and regulations	Benefit Systems Group, covering employees and associates	Group companies comply with Labour Code requirements for occupational health and safety – new employees and associates receive onboarding training, and regular refresher training is provided. Available materials include safe-use instructions for office equipment, fire safety guidance, and first aid procedures. Job-specific instructions, accident response procedures, and occupational risk assessments are in place. Safety-related guidelines and training materials are made available via the intranet.	Head of HR
Privacy	Personal Data Protection Policy	Parent (internal data protection regulations are also in force in other Group companies, in line with applicable legislation)	Establishes the rules for processing personal data in compliance with applicable regulations, particularly the GDPR, including rules ensuring data security.	Head of Legal
Work-life balance	Agreement on the determination of working time schedules Remote Work Rules	Parent	Working time agreements allow employees to choose their start time. Define the principles for performing remote work (either fully or partially).	HR Director/HR and Administration Director
Secure employment	Work rules, structured process for hiring new employees, and position change procedures.	Parent	Regulations governing workplace organisation and conduct between employer and employee.	HR Director/HR and Administration Director

Occupational health and safety and personal data protection matters concerning employees and associates are regulated at the level of individual Group companies, with their respective management boards responsible for implementing the relevant policies.

The Parent conducts regular surveys to assess employee opinions and expectations. Alongside applicable legal provisions, these insights form the basis for introducing changes to the rules governing the Company's operations.

Works councils operate within Group companies, which are involved in consultations and decision-making regarding working conditions and employee-related matters.

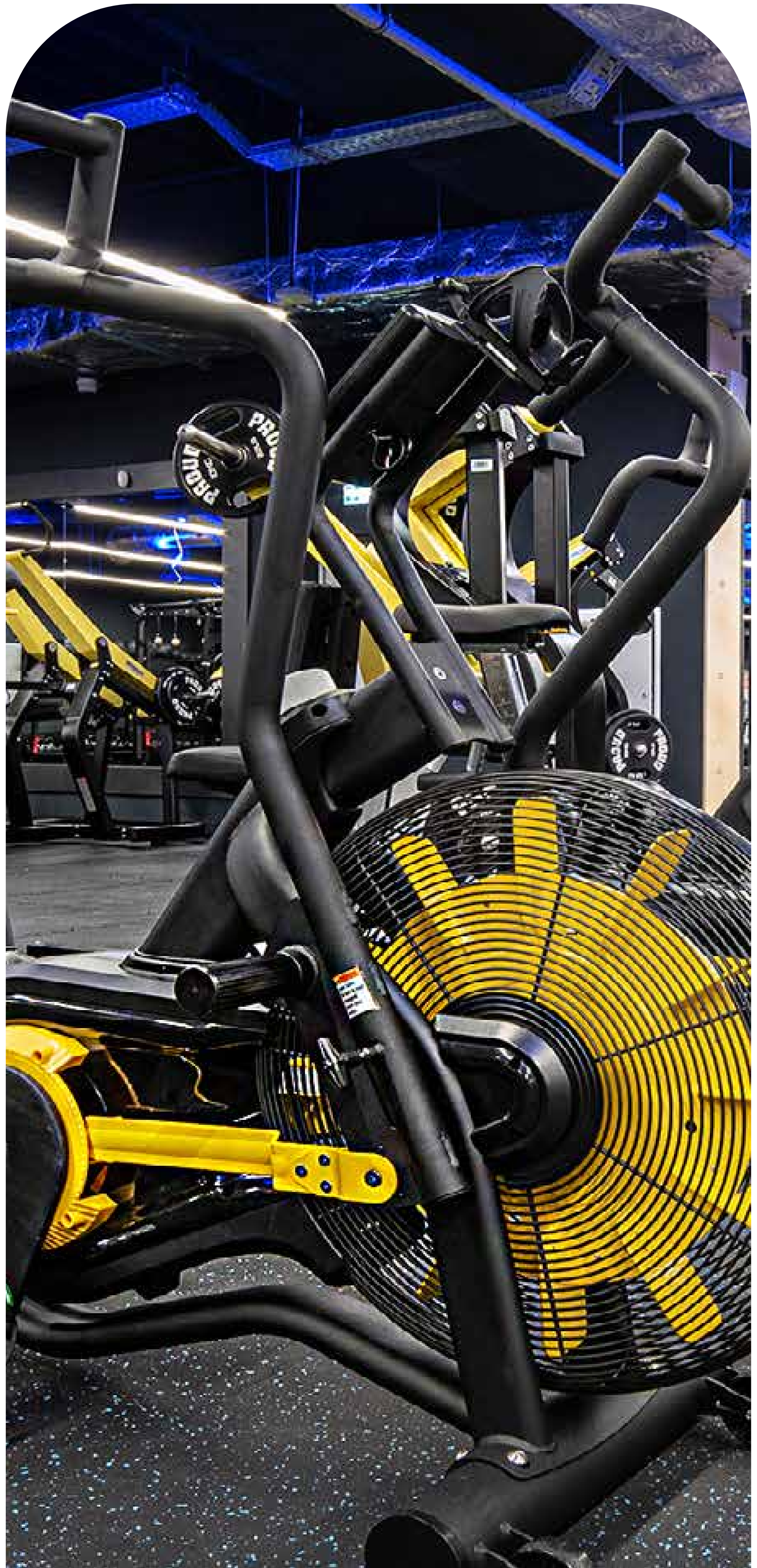
Information about the policies, regulations, and rules in force within Group companies is available via internal intranet systems.

The regulatory framework applicable to suppliers, including requirements related to forced labour and occupational safety, is described in subsection G1-2 of the section 'Business conduct'.

Accident prevention

The Group has not adopted a uniform, formalised accident prevention policy. However, Group companies have implemented procedures that include, among others, workplace accident analysis, the development of measures to minimise the risk of incidents and their recurrence, and procedures for responding to accidents or terrorist threats. Additionally, the Parent applies workstation-specific instructions and risk assessment sheets that support the identification and mitigation of potential hazards. OHS Officers operating within Group companies are responsible for monitoring compliance with OHS regulations and the effectiveness of related measures.

Safety management systems are particularly well developed in the Polish and Czech companies. In other countries, health and safety matters are governed by basic instructions/procedures or outsourced to external service providers.



Human rights

No formal human rights policy has been adopted at the Group level. However, in 2024, the Parent Benefit Systems S.A. commenced work on the implementation of a due diligence policy called the Benefit Systems Group Responsible Business Conduct Policy, which is scheduled for adoption in 2025. Nonetheless, the Group companies observe human and labour rights in their day-to-day operations.

The Group recognises that the UN Guiding Principles on Business and Human Rights directly reference the International Bill of Human Rights (which includes the Universal Declaration of Human Rights and both International Covenants on Human Rights) and the ILO Declaration on Fundamental Principles and Rights at Work, along with its core conventions.

At present, the Group's formal references in its documents include:

- Universal Declaration of Human Rights (UDHR),
- International Labour Organization (ILO) conventions, as explicitly mentioned in the Benefit Systems Group Code of Ethics – BS Way. The Group declares its respect for human rights and labour rights, acting in accordance with the UDHR and the ILO conventions.

In practice, through the implementation of the Code of Ethics, various internal procedures (for instance, anti-bullying procedures, work rules and remuneration policies), and the whistleblowing system, the Group largely adheres to the principles set out in the UN Guiding Principles, the ILO Declaration, and associated conventions.

The work and remuneration rules ensure appropriate working conditions for all employees, in line with fundamental ILO standards, including occupational health and safety, working hours, and fair pay practices. In this respect, the Group aims to provide stable and transparent employment conditions, aligned with best market practices.

The Group strives to make sure that all individuals providing work to the Group are treated with respect and in accordance with their rights to privacy, tolerance, equality, and dignity. The Group ensures a safe and healthy work environment, supports the development of employees' professional competences, and promotes social education. The organisation protects sensitive data and does not engage in child or forced labour under any circumstances.

Benefit Systems S.A. has adopted the Diversity, Equity and Inclusion (DEI) Policy,

which outlines and defines the key directions of action in building and supporting a diverse and inclusive organisation.

In the DEI Policy, the Company has committed to fostering a culture of diversity and equal treatment, and to cultivating a culture of belonging for all employees, regardless of sexual orientation, gender identity, age or origin. The implementation of the DEI Policy was preceded by an extensive process involving various groups of employees and associates.

Regulatory matters were addressed through workshops, research, focus groups, and surveys.

Good practice guidelines for addressing cases of workplace bullying and discrimination are in place to ensure that employees understand the procedures to follow and know whom to contact should any concerning situation arise. These guidelines include, among other things:

- the appropriate reporting channels,
- the required information for submission,
- the procedural steps following the submission, and
- the composition of the team appointed to investigate the allegations.

For nearly a decade, the Parent has delivered training on anti-discrimination policies and practices, which are also included in onboarding programmes. Diversity and anti-discrimination are also addressed in training for management and recruitment teams. In 2024, educational initiatives were undertaken covering neurodiversity, ADHD, and depression.

A Social Committee also operates within the Company, aimed at supporting employees from various at-risk groups who may be experiencing hardship, as well as individuals facing financial or family difficulties. The Group companies clearly state that they do not tolerate any form of discrimination, and that its prevention is an integral part of the Work Rules, Code of Ethics, and other internal documents referenced in this section. Discrimination is prohibited on grounds of race, gender, age, disability, sexual orientation, religion, national origin, marital status, political beliefs, or other personal characteristics.

The Group has implemented a whistleblowing system, where each report initiates an investigative procedure. Where violations are confirmed, appropriate remedial measures are taken, including disciplinary action against those responsible.

Complementary policies and procedures enabling the monitoring of compliance with the Group's commitments are further detailed in the section 'Business conduct (G1)'.

Policies and procedures on recruitment, promotion and professional development

The Company's recruitment, internship, training, and promotion processes are based on qualifications, competencies, and experience. These principles are clearly defined in internal documents such as Recruitment and Selection Process, Internal Recruitment Good Practices, and Recommendation Campaign – Good Practices. These processes are supported by training and workshops for managers and recruitment teams to reinforce principles of equal treatment and to mitigate unconscious bias during recruitment.

The Company maintains systematic records of recruitment, training, and promotions to ensure a transparent view of development and career opportunities within the organisation. Job postings are made available to employees and associates via the corporate website and the intranet. All recruitment processes are recorded in the electronic system.

Skills development and training programmes

Benefit Systems S.A. has a training planning and implementation process in place, which sets out the rules for budgeting, organising, and evaluating training activities. Training programmes include both Group-wide initiatives and tailored development activities for individual departments. Employees and associates may submit individual requests to participate in training, and each department is able to allocate a separate budget for the development of its team's competencies.

All employees and associates of the Parent are required to participate in mandatory ethics and compliance training, which covers the Code of Ethics, anti-corruption policies and guidelines on avoiding conflicts of interest.

S1-2

Processes for engaging with own workforce and workers' representatives about impacts

The Benefit Systems Group has not implemented uniform procedures for engaging with employees and associates. Each Group entity applies its own approach in this regard, taking into account local needs and available resources.

Process to identify impacts, risks, and opportunities

The Benefit Systems Group engaged its own workforce, an external consultancy, and representatives of various stakeholder groups in the double materiality assessment process. As part of the process:

- Surveys were conducted in all countries in which the Group operates, along with in-depth interviews,
- The results were analysed and presented during a series of workshops attended by employee representatives from various departments across the organisation,
- In one of the workshops, actual and potential negative impacts on human rights were assessed, including impacts affecting employees and associates.

The Group did not identify any individuals within its own workforce who may be particularly vulnerable to impacts or marginalised.

In October 2024, the list of material matters resulting from the assessment was also shared with employee representatives. This provided them with access to information on priority topics and the opportunity to express their views or propose amendments.

This approach enabled the Group to take into account the perspectives of employees and associates in identifying ESG priorities, including those related to its own workforce. The participation of the workforce in future updates of the double materiality assessment is planned for subsequent years.

Types of engagement with own workforce

In the Parent and other Group companies, the views of individuals performing work are taken into account in decision-making processes concerning key employment matters. Responsibility for this area in the Parent lies with the Management Board member responsible for Human Resources. The organisation consults its own workforce on policies, operational activities and procedures relating, among others, to working conditions, employee benefits, and occupational safety. In some companies, the opinions of employees and associates are gathered as early as the preparatory phase of regulations and throughout their implementation or the modification of existing provisions.

In certain Group companies, including Benefit Systems S.A. and VanityStyle sp. z o.o., works councils have been established. In companies without formal consultative structures, open communication and the inclusion of employee feedback in decision-making are maintained. Cooperation with the works council at Benefit Systems S.A. is conducted through various communication channels, such as in-person meetings, email correspondence, and videoconferencing. In cases requiring the works council's formal opinion, the Company requests an official position– for example, with regard to the implementation of internal whistleblower regulations, the selection of a medical services provider, or decisions on granting financial assistance under the MultiUczynek projects. The Parent assesses the effectiveness of employee engagement using the Pulse Check tool, which is designed to evaluate employee sentiment, satisfaction, and engagement. One of the metrics considered is the percentage of employees participating in the survey.

Engagement with own workforce may occur at different stages of the process:

- prior to implementation (preparatory phase),
- during the implementation of changes (implementation phase),
- and after implementation (evaluation and potential adjustment phase).

Examples of own workforce engagement within the Group in 2024:

- Surveys – used across multiple Group companies to gather feedback from employees and associates (including the annual internal survey conducted by the Parent – Pulse Check),
- Meetings – the opportunity to submit comments and ask questions is also available during quarterly town hall meetings and semi-annual evaluation meetings. Feedback is also collected on an ongoing basis during weekly team meetings,
- Zoom on Business meeting series – during which specific business areas are presented and discussed, ranging from product strategy and HR management to financial results, sales, communications, and technology solutions. In 2024, seven such meetings were held, including with the Management Board of the Company. On average, nearly 500 employees attended each meeting,
- Whistleblower procedures – operating continuously,
- Direct conversations and an open-door policy – applicable to both HR departments and management boards, applied across most Group companies with no formal frequency limits,
- General meetings, HR department email communications,
- Webinars and workshops – organised based on current needs.

Irregularities can be reported through dedicated channels, and feedback provided by employees is used by line managers to support decision-making processes.

Resources supporting engagement in decision-making processes:

- The role of the management boards of individual Group companies in approving key procedures,
- The involvement of HR departments and the ESG department,
- Use of internal and external tools (surveys, workshops, whistleblower platforms).

Results of engagement

The information collected through surveys, workshops, or whistleblowing procedures is recorded and analysed by dedicated units, such as the HR department, the management boards of individual Group companies, project teams, or the Ethics Committee (in cases involving suspected violations). Feedback from employees is subsequently used to inform day-to-day operational decisions (for example, shaping employee benefits), as well as strategic matters, such as determining ESG priorities within the double materiality assessment. In practice, this means that once feedback is gathered and analysed – regardless of whether it derives from surveys, workshops, or whistleblowing channels – Group companies are able to make adjustments to their processes. In the Parent, key business decisions are presented and discussed during quarterly town hall meetings or weekly team meetings

S1-3

Processes to remediate negative impacts and channels for own workforce to raise concerns

General approach

The Benefit Systems Group seeks to ensure that when its activities, or those of its subsidiaries, cause or contribute to material adverse impacts on people in its own workforce, appropriate remedies are provided. The aim is not only to mitigate consequences and provide adequate support to affected employees and associates, but also to implement solutions that prevent the recurrence of similar incidents in the future. Depending on the nature of the negative impact, remediation processes are coordinated by various units, including the HR department, and OHS Officers. The Ethics Committee monitors the remediation processes.

Negative impacts may be identified through several channels, including:

- formally established whistleblowing channels, occupational health and safety reports, submissions to HR, etc.,
- regular employee surveys (such as Pulse Check),
- direct engagement with employees and associates (through workshops, Zoom on Business sessions with the Management Board, consultations with line managers and works councils),
- monitoring patterns and repeated occurrences (for example, analysing root causes of work-related accidents).

Remedial measures are tailored to the type and scale of the issue and may include:

- amending internal procedures and rules,
- introducing organisational changes,
- disciplinary action against those responsible for violations.

In 2024, the Group did not have a uniform, formalised process for evaluating the effectiveness of remedial actions across all companies. However, the existing processes in each company enabled effective responses to reported cases, their analysis, and the implementation of appropriate corrective measures.

The effectiveness of such measures is monitored at the operational level by:

- analysing the number and recurrence of concerns raised,
- tracking employee and associate satisfaction via recurring surveys,
- analysing occupational health and safety metrics (for example, reduction in the number of accidents and near misses).

Whistleblowing

WEmployees and associates within the Group may report irregularities through the following channels:

- by reporting violations of law as defined in the Whistleblower Protection Act (for details, please refer to the section ‘Business conduct’),
- by submitting concerns related to employee matters such as workplace bullying or discrimination. Depending on the Group company, such reports may be submitted to HR departments, works councils, or via dedicated email addresses.

The Parent has implemented a detailed anti-bullying procedure, under which reports must be submitted in writing or electronically and signed with the full name of the reporting person. Upon receipt of a report, an independent review panel is appointed, composed of an employee representative, a person designated by the employer, and an individual designated by the reporting person. This process ensures impartiality and confidentiality.

Each report initiates an investigation procedure conducted by the appropriate HR units. Depending on the nature of the case, the following actions may be taken:

- appointment of an investigative team ––for example, in cases involving allegations of bullying or discrimination,
- interviews with the reporting person, witnesses, and the individual named in the report,
- assessment of the report’s validity and formulation of recommendations for further action,
- implementation of remedial actions, including warnings, transfers to other positions, or – in extreme cases – termination of employment.

In most of the Group companies, in accordance with regulatory requirements on whistleblower protection, mechanisms have been implemented to raise awareness among employees and associates regarding the availability of reporting channels for violations of legal provisions listed in Art. 3.1 of the Whistleblower Protection Act, or in accordance with applicable local regulations in foreign subsidiaries. Information on these mechanisms is provided during onboarding training for each new hire. Additional informational materials are distributed via email and internal IT systems.

As part of the double materiality assessment conducted in 2024 for the Parent and selected Group companies, information was obtained regarding the effectiveness of communication on whistleblowing channels. In selected subsidiaries, this matter is also evaluated through employee satisfaction surveys.

When raising concerns or needs, members of own workforce may also use the engagement mechanisms described in the section ‘S1-2 Processes for engaging with own workforce and workers’ representatives about impacts’.

Remediation of material negative impacts

The only actual negative impact identified during the double materiality assessment relates to the form of employment of associates in sports and fitness facilities. It was recognised that the employment model may adversely affect the job stability of associates (instructors, trainers, etc.) due to lower levels of legal protection and a reduced sense of security.

Currently, the Group does not have a dedicated solution that directly addresses this impact. However, Group companies maintain transparent communication practices to ensure that the nature and terms of engagement are clearly communicated at the recruitment stage. The limited ability to mitigate this impact stems from the widespread preference among individuals (trainers and instructors) for flexible forms of employment that allow them to provide services to multiple employers.

The mitigation of potential negative impacts is described in the section ‘S1-4 Taking action on material impacts on own workforce’.

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Work-related accidents

The Parent has implemented clearly defined procedures for addressing work-related accidents, commuting accidents, near misses, and work-related ill health. All such incidents are subject to formal reporting and analysis in order to provide appropriate support and implement preventive measures.

Accident reporting channels

- In Benefit Systems S.A., the person affected by a work-related accident (or a witness) is required to immediately notify their line manager. The line manager reports the incident to the OHS unit and submits a written report via email.
- In the Fitness Branch, work-related accidents are reported via the Fitmeet platform. The line manager of the affected individual completes a dedicated form, which is then forwarded to the designated OHS representative.

The root causes of work-related accidents are regularly analysed. Based on these assessments, appropriate preventive measures are identified, particularly with reference to the occupational risk assessment for the relevant position. Remedial actions may include changes to health and safety procedures, additional training, or modifications to work organisation or equipment.

In subsidiaries operating outside Poland, work-related accident procedures are adapted to local legal frameworks. Depending on the country, health and safety responsibilities may lie with an external workplace safety service provider or a designated internal specialist.

Regardless of the model in place, all work-related accidents must be promptly reported to the relevant line manager, who then notifies the HR department. Companies are required to maintain documentation both for the purpose of incident investigation and to support any entitlements (such as medical support or compensation)

In some countries, dedicated workplace health and safety committees are established, and incidents are recorded in internal logs or registers. These processes are typically coordinated with HR, in-house legal counsel, or other authorised units.

S1-4

Taking action on material impacts on own workforce

In 2024, the Group companies addressed selected material impacts, risks, and opportunities related to their own workforce. Insights into these impacts, risks, and opportunities were obtained through the double materiality assessment carried out in 2024, which the Group treats as a point of departure for identifying areas requiring action on the part of area owners and the Group companies in subsequent years.

Data on the effectiveness of some actions, particularly those of an ongoing and operational nature, are not monitored. Effectiveness indicators for training, health and safety, and work-life balance are provided in sections S1-13, S1-14, and S1-15.

Training and skills development

In 2024, the Group implemented onboarding programmes, thematic training, and development workshops for new and current employees. Some companies are planning to expand their training offer to include mentoring programmes and the promotion of internal mobility.

Key initiatives:

- Management training – targeted at middle and senior management, aimed at enhancing managerial competencies and improving the quality of task delegation. Effectiveness is monitored through evaluation surveys and the analysis of HR reports concerning incorrect task assignment,
- Champions League mentoring programme – an initiative facilitating the transfer of knowledge through mentoring provided by experienced employees to colleagues with shorter tenure,
- Thematic and competency-based training – employees may participate in courses aimed at developing technical, soft, and language skills,
- Webinars and training on diversity and inclusive leadership – conducted in cooperation with experts, including the Mamy Podobnie foundation, aimed at raising awareness of neurodiversity and inclusive team management,
- Co-financing of undergraduate and postgraduate studies – financial support for formal education. Priority is given to employees who do not manage or supervise others (such as assistants, junior specialists, specialists, and senior specialists),
- Career paths are being gradually implemented within individual teams to support employees in understanding promotion and development opportunities. These paths define the steps, skills, and experience required, and clearly outline expectations for candidates seeking higher-level positions. Individual development plans, developed jointly with the line manager and the HR Department, enable employees to identify specific actions they may undertake to achieve their professional objectives.

All training programmes are implemented on a continuous basis, with regular updates tailored to the evolving needs of the organisation.

Occupational health and safety

Occupational health and safety remains one of the Group's key priorities. Implemented measures focus on minimising the risk of work-related accidents, improving safety standards, and ensuring appropriate working conditions for employees and associates.

Key initiatives:

- Occupational risk monitoring and workstation ergonomics – regular risk assessments and the implementation of preventive measures. Health and Safety Officers conduct regular audits, with findings supporting the adjustment of safety measures to the specific nature of each role,
- Occupational health and safety training – mandatory for all employees and associates, conducted both periodically and as part of the onboarding process,
- Manager training and regular monitoring of task allocation – in sports and fitness facilities, tasks are occasionally delegated that may exceed the core competencies of staff. To address this, the Group plans to expand training programmes tailored to the operational realities of fitness clubs and enhance operational supervision to ensure alignment between assigned tasks and the qualifications of employees and associates.

Occupational health and safety activities are implemented on an ongoing basis, with periodic reviews of the effectiveness of the procedures in place. The effectiveness of these initiatives is monitored through analysis of incident reports and health and safety records. Quantitative data related to health and safety are provided in section S1-14.

Work-life balance

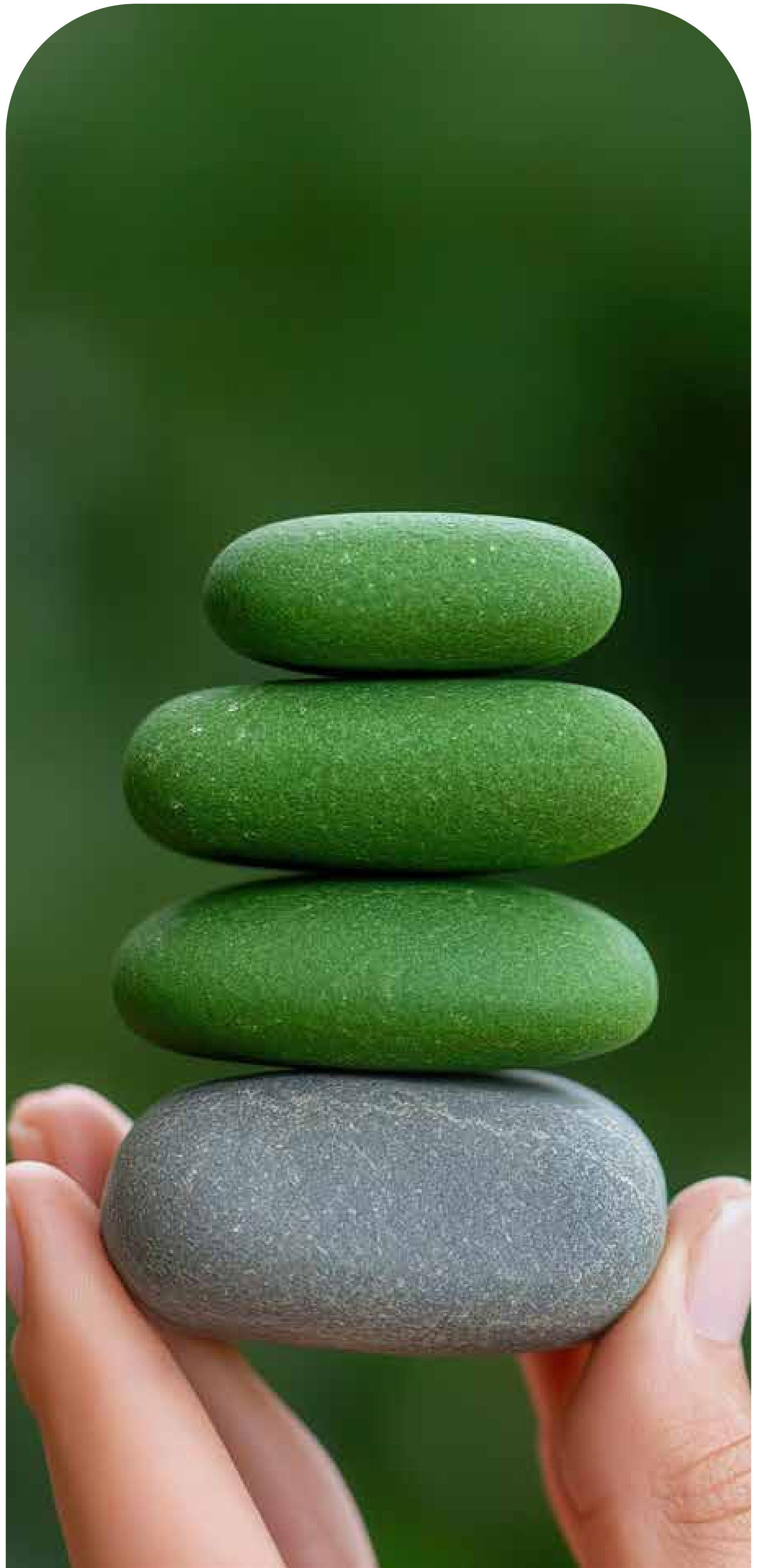
The Group actively promotes work-life balance, recognising it as a critical factor supporting the well-being and engagement of employees and associates.

Key initiatives:

- Class schedule consultation system – implemented in fitness clubs to improve shift predictability and facilitate better planning of personal time. The Group is planning improvements in working time management, including the development of tools to support schedule planning and the introduction of more advanced consultation processes to enhance flexibility and better align shift schedules with the needs of employees,
- Transparent communication with candidates – during the recruitment process, candidates are informed about the flexibility of schedules and the specific nature of shift-based work in fitness clubs.
- Subsidies for childcare (nurseries and kindergartens),
- Remote work opportunities in justified cases,
- Psychological support and well-being programmes,
- Healthy meals and on-site fitness activities.

In 2024, the Group initiated work on an internal well-being strategy to define its priorities regarding the well-being of its own workforce and to monitor the effectiveness of related initiatives. The strategy is expected to be finalised in 2025, and its outcomes will inform subsequent actions supporting work-life balance.

Quantitative data on work-life balance are presented in section S1-15.



Secure employment

The cooperation model in parts of the organisation, based on civil-law agreements and B2B contracts, provides flexibility but may be perceived as less stable. In response, the Group ensures transparent communication during the recruitment process so that candidates are fully informed of the terms of the engagement. Plans are in place to analyse the feasibility of introducing additional support mechanisms for individuals engaged under these forms of employment, with the aim of strengthening their sense of job security.

Privacy

Ongoing initiatives:

- Mandatory IT security and personal data protection training for all employees and associates, conducted regularly to increase awareness of risks and implement best practices for privacy protection. The introduction of periodic refresher training for the entire organisation is planned.
- Dedicated persons (such as data protection officers, security officers) oversee the proper operation of the processes.)

Challenges and planned initiatives:

In the area of internal communication, a challenge remains the use of informal channels, such as social media groups, by associates at sports and fitness facilities. To address this issue:

- managerial training on effective communication is conducted,
- official communication tools, such as the intranet and the Teams application, are promoted,
- plans are in place to intensify the promotion of dedicated communication tools at sports and fitness facilities in order to strengthen their effective use and limit the reliance on informal communication channels.

Activities related to privacy protection and cybersecurity are carried out on an ongoing basis. The further implementation and promotion of communication tools at sports and fitness facilities is planned for the short- to medium-term horizon.

Process for selecting appropriate actions

Some initiatives aimed at supporting employees are based on feedback obtained through the employee and associate satisfaction survey conducted by Benefit Systems S.A. and the Fitness Branch.

The results of the survey are analysed and used to support organisational changes, followed by focus workshops, where employees propose initiatives and suggest modifications. In the Parent, employee feedback is also collected through the annual Pulse Check, which assess employer actions, employee needs, and expectations.The results are anonymous, and the information gathered is used to refine activities. Additionally, matters related to remuneration, benefits, and working conditions are consulted with the Works Council. Regular satisfaction surveys, individual conversations, and key performance indicators, such as turnover, productivity, and benefit uptake, enable the Group to monitor the effectiveness of measures targeting employees and associates.

In 2024, the Group did not identify a need to implement remedial actions in connection with actual material negative impacts on employees or associates, due to the absence of reported incidents and the lack of material consequences requiring redress.

The Group does not have any data that would enable it to report additional information for 2024 regarding how it ensures that its practices do not cause or contribute to material negative impacts on its own workforce.

In the absence of a formally adopted climate transition plan in effect in 2024, the Group does not report in this statement on measures undertaken to mitigate any adverse impact of such a plan on its own workforce.

Risks related to privacy and data security, consistent with those identified in the double materiality assessment, are integrated into the Group's risk management system.

Resources

To manage material impacts on employees and associates, the Group relies on internal resources and external support. Internal resources include:

- financial resources – budgets allocated for training, professional development programmes, wellness workshops, and initiatives related to occupational health and safety and employee engagement,
- human resources – HR teams responsible for coordinating training and development activities, including the organisation and implementation of initiatives supporting professional growth and employee well-being.
- technological resources – e-learning platforms, systems supporting training processes, and technological infrastructure enabling the execution of HR-related activities.

Additionally, selected HR and training projects are supported by external consultants.

Examples of expenditures related to sustainability initiatives in the workforce area:

Material topic	Main objective	Supporting objective	Budget implemented in 2024	Budget for 2025	CapEx/ OpEx
Training and skills development	Maintain the average number of training hours per employee in the Group at no less than 26 hours annually over a three-year period.	Increase by 5% the proportion of surveyed employees who consider the Group an employer that supports their professional and personal development (increase within three years compared to the 2024 baseline).	PLN 3.2 million	PLN 3,700 000	OpEx
Work-life balance	Introduce solutions that support work-life balance.	Increase by 5% the proportion of surveyed employees who consider the Group an employer that supports the work-life balance of its employees (increase within three years compared to the 2024 baseline)	PLN 820,000	PLN 1,120,000	OpEx

S1-5

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The Benefit Systems Group's ESG Strategy for 2024–2026 includes key topics related to own workforce that were identified as strategic prior to the double materiality assessment conducted in accordance with ESRS requirements. The year 2024 has been adopted as the baseline, and the target implementation period extends until the end of 2026. Baseline values for the targets will be derived from data available as at the end of 2024, which will be fully analysed after the publication of the sustainability report. The presentation of results for 2024 and 2025 and their comparison will be possible in the 2025 statement. The supporting targets are expressed in relative terms.

The strategy is scheduled to be updated in 2025 following the completion of the first reporting cycle in accordance with the new ESRS standard, and based on the results of the double materiality assessment, gap analysis, and ESRS requirements concerning the measurability of targets.

Material topic	Material sub-topic	Commitment	Main objective	Supporting objective	Metric
Equal treatment and opportunities for all	Training and skills development	Educate and provide employees with the space for individual professional and personal development	Maintain the average number of training hours per employee in the Group at no less than 26 hours annually over a three-year period.	Increase by 5% the proportion of surveyed employees who consider the Group an employer that supports their professional and personal development (increase within three years compared to the 2024 baseline).	Metric: increase in employee proportion
Working conditions	Work-life balance	Support the maintenance of work-life balance for employees	Introduce solutions that support work-life balance.	Increase by 5% the proportion of surveyed employees who consider the Group an employer that supports the work-life balance of its employees (increase within three years compared to the 2024 baseline).	Metric: increase in employee proportion

The objective to educate and provide employees with the space for individual professional and personal development is linked to the Training Planning and Implementation Process, Recruitment and Selection Process, and Internal Recruitment Good Practices

The methodology for developing the ESG strategy is described in detail in the section 'General information'.

The process for monitoring policies and the effectiveness of actions related to those material topics for which output-oriented targets have not been defined covers areas such as:

To date, no targets have been defined for the following material topics concerning employees and associates: occupational health and safety, secure employment, and the risk of breaches of workforce privacy. These areas are currently managed as part of existing policies and actions. The decision to add dedicated targets will be taken during the 2025 ESG strategy update.

In the area of health and safety, the main indicators used include the number of accidents and near-miss incidents (analysed under post-accident procedures). The privacy area is monitored through the tracking of incidents and personal data breach notifications. No ambition levels have been set for the aforementioned areas.

S1-6

Characteristics of the undertaking's employees

The analysis includes only individuals employed under an employment contract and in an active employment relationship as at 31 December 2024. The reported figures are not converted into full-time equivalents (FTE).

Total number of employees by gender

1542
Female

895
Male

0
Other/Not disclosed

2437
Total

Liczba pracowników w podziale na kraje w Grupie Kapitałowej:

Country	Number of employees (headcount)
Poland	1240
Czech Republic	471
Slovakia	206
Bulgaria	321
Croatia	71
Turkey	128

Total number of employees by type of contract, working time, and gender

Category	Gender				Total
	Female	Male	Other	Not disclosed	
Number of employees (headcount)	1,542	895	0	0	**2,437**
Permanent employees (headcount)	1,304	780	0	0	**2,084**
Temporary employees (headcount)	238	115	0	0	**353**
Non-guaranteed hours employees (headcount)	57	23	0	0	**80**
Full-time employees (headcount)	1,328	816	0	0	**2,144**
Part-time employees (headcount)	157	56	0	0	**213**

Total number of employees by contract type and country

Category	Country						Total
	Poland	Czech Republic	Slovakia	Bulgaria	Croatia	Turkey	
Number of employees (headcount)	1240	471	206	321	71	128	**2437**
Permanent employees (headcount)	1014	462	93	317	70	128	**2084**
Temporary employees (headcount)	226	9	113	4	1	0	**353**
Non-guaranteed hours employees (headcount)	0	0	80	0	0	0	**80**
Full-time employees (headcount)	1215	313	105	313	70	128	**2144**
Part-time employees (headcount)	25	158	21	8	1	0	**213**

Number of employees who left the organisation during the reporting period and employee turnover rate

Category	Value
Number of employees who left the organisation during the reporting year	565
Employee turnover rate in 2024	23,19%

* The turnover rate was calculated as the number of employees who left during the reporting period divided by the number of employees as at 31 December, multiplied by 100%.

* The number of employees who left the organisation in the reporting period and the employee turnover rate in the Group also includes data from Fit Invest D.O.O.. and H.O.L.S. D.O.O. due to the relatively high number of departures - a total of 45 people.

The relatively high turnover rate was due to multiple factors. One is the nature of the fitness sector, which often involves hiring individuals for front desk or trainer roles that typically represent a transitional stage in one's career, particularly among university students or young adults. Additionally, the Group's model of acquiring clubs, which includes taking over existing facilities along with their personnel, may also contribute to increased turnover, as changes in ownership can serve as a trigger for employees to seek new professional opportunities.

This employment model tends to favour higher mobility and staff turnover and includes a larger share of fixed-term employment. Individuals in such positions typically remain with the Group for a shorter duration, often treating the role as a temporary phase in their career or combining it with other professional or academic commitments.

The employee data presented in the tables has been compiled based on internal HR systems. The non-financial statement reports the headcount as at 31 December 2024, whereas the financial statement presents the average headcount for the reporting period. Reference to note 4.1 of the Directors' Report.

The measurement of metrics relies on internal HR reporting systems and has not been subject to validation by an independent external party. This applies to all metrics presented under disclosure S1, meaning the data disclosed is based solely on internal HR sources. Should external validation be implemented in the future, this will be duly disclosed.

S1-7

Characteristics of non-employees in the undertaking's own workforce

Associates (non-employees) providing work for Group companies include:

- self-employed individuals (B2B):
  - fitness club managers,
  - IT specialists,
  - marketing experts,
  - personal trainers at fitness clubs,
  - lawyers and legal advisors,
- individuals working under civil-law contracts (contract of mandate – umowa zlecenie, specific-task contract – umowa o dzieło):
  - fitness instructors and trainers delivering group or individual sessions at fitness clubs,
  - reception staff at fitness clubs,
  - cleaning staff and administrative support,
  - lecturers at events (e.g. MultiSport Health Days),
  - content creators (including AV materials, animations, graphics, translations),
- individuals providing outsourced services:
  - call centre and customer service support.

Number of non-employees in the Group's own workforce

Category	Number*
Non-employees (associates) (categories listed above)	6394
Individuals engaged by agencies	0
Total	6394

* The analysis covers individuals in an active employment relationship as at 31 December 2024.

The data concerning non-employees in the undertaking's own workforce has been compiled based on internal HR registers and personnel reports prepared by the respective companies within the Group. It includes individuals providing services under self-employment arrangements (B2B) or civil-law contracts (umowa zlecenie, umowa o dzieło) as at 31 December 2024. The data covers both individuals engaged under long-term contracts and those involved in short-term projects. The reported figures reflect headcount and are not converted into full-time equivalents (FTE).

S1-13

Training and skills development metrics

Average number of training hours by gender

2024	
Gender	Average number of training hours
Female	35,95
Male	24,75

The training hours data includes both employees and associates. The metric represents the average number of training hours per person within each gender group (women/men), calculated as the total number of training hours delivered during the reporting period divided by the number of individuals in each category as at 31 December 2024.

The analysis includes all training programmes delivered by the Group, encompassing both mandatory operational training and developmental initiatives. These programmes primarily comprised onboarding training conducted across all Group entities, while other types of training varied depending on each company's operational profile.

The metric does not include training financed individually by employees or development programmes conducted outside the formal training registration system.

The average number of training hours was calculated using data extracted from the Group's internal HR systems that track individual participation and assigned training hours. The metric is not expressed in full-time equivalents (FTE), and therefore reflects actual participation regardless of the form of employment or engagement.

Number of performance reviews among employees by gender

Gender	Number of employees at December 2024	Number of employees reviewed	%
Female	1542	737	47,78%
Male	895	440	49,16%
Total	2437	1177	48,30%

The Parent operates a semi-annual performance evaluation system for managers overseeing teams and senior managers functioning as independent experts. The system is linked to the Management By Objectives (MBO) bonus framework. The performance review process includes the definition of individual goals, the methods and metrics for their achievement, a review of results from the previous bonus period, and the planning of development actions for the employee. Strategic objectives are cascaded from the Management Board down to managers. Specialists are subject to quarterly and/or semi-annual performance assessments conducted during one-on-one meetings with their line managers, following a methodology developed within each team and adapted to its current operational needs. Additionally, every remuneration review process in the company is based on performance evaluations carried out using a standardised tool provided to managers by the HR department.

S1-14

Health and safety metrics

Standards for internal verification carried out by the internal OHS units, as well as potential external certification of the OHS management system, are established at the level of each company. The Group has not implemented external certification. The monitoring of potential hazards and the assessment of any irregularities are conducted by internal OHS units within individual companies.

The Group has also implemented occupational risk assessments, which are regularly updated in response to regulatory changes or new circumstances. In office environments, OHS specialists are responsible for occupational safety, including the provision of training and maintenance of records related to work-related accidents.

Data on accidents and injuries are collected through internal reporting systems and employee submissions. The number of days lost due to injuries includes both medical leave and recovery periods. The analysis covers both employees and non-employees in an active employment relationship as at 31 December 2024.

Key health and safety management metrics:

Category	2024 data	
Percentage of employees covered by a health and safety management system based on legal requirements and/or recognised standards or guidelines	98.92%	%
Number of fatalities resulting from work-related injuries and work-related ill health	0	Number
Number and rate of recordable work-related injuries among employees		
Number	3	Number
Rate	0	Average per million hours worked

Category	2024 data	
Number of recordable cases of work-related ill health among employees	0	Number
Number of days lost due to work-related injuries, work-related fatalities, work-related ill health, and fatalities from work-related ill health	75	days
Number of recordable cases of work-related ill health among non-employees	N.A.	Number
Number of days lost due to work-related injuries, fatalities, work-related ill health, and fatalities from work-related ill health among non-employees	N.A.	days
Number of own workforce covered by a health and safety management system that has been internally audited and/or audited or certified by an external party	1427	Number

The data presented on occupational health and safety management are based on internal reporting systems that track the number of injuries, fatalities, and days lost due to work-related incidents.

During the reporting period, three work-related injuries were reported among employees. The corresponding rate – the average number of incidents per million hours worked – was 0. The low number of incidents reflects an overall positive occupational safety performance. The absence of data on non-employees results from the fact that information on this group is not yet comprehensively integrated into the reporting systems.

The management of occupational health and safety within the Group is decentralised and conducted independently by each Group company. The process is aligned with applicable legal requirements in each country of operation, ensuring compliance with local regulations.

S1-15

Work-life balance metrics

Percentage of employees entitled to family-related leave and the percentage of entitled employees that took family-related leave, by gender

Period	2024*		
Gender	Female	Male	Total
% of employees entitled to family-related leave	100%	100%	100%
% of entitled employees that took family-related leave	21.58%	9.81%	31.39%

* The analysis covers employees in an active employment relationship as at 31 December 2024.

All employees of the Group are entitled to family-related leave in accordance with applicable labour law, social policy, or internal regulations in force across the Group's subsidiaries and countries of operation.

The most common forms of family-related leave include: maternity leave, paternity leave, parental leave, childcare leave, leave to care for a sick child or family member, caregiver leave, special leave (due to marriage, childbirth, or the death of a family member, etc.), and other types of leave related to important family events.

The Group's family leave policy is tailored to local legal requirements, ensuring that each employee has access to appropriate entitlements in line with applicable legislation.

ESRS S2

Workers in the value chain

SBM-3 S2

Material impacts, risks and opportunities and their interaction with strategy and business model

VALUE CHAIN WORKER

the scope of workers in the value chain include all workers in the undertaking's upstream and downstream value chain who are or can be materially impacted by the undertaking. This includes impacts that are connected to the Group's own operations, and value chain, including through its products or services, as well as through its business relationships. The term includes all workers who are not included in the scope of own workforce, as described in subsection S1.

The Group's most significant impacts on value chain workers relate to individuals employed at partner fitness facilities. This category includes, among others, trainers, instructors, facility managers, administrative staff, and reception personnel engaged on employment contracts, civil-law contracts, or as sole traders.

Other groups of value chain workers affected by the Group's activities include:

- employees of suppliers supporting the provision of Group services, such as well-being services,
- logistics and distribution workers employed by entities within the upstream value chain,
- manual workers such as cleaning personnel, warehouse operatives, and construction workers.

All the categories above fall within the scope of this disclosure.

Potential negative impacts on value chain workers stem from the specific characteristics of the fitness industry in which the Group's partners operate, an industry that is exposed to risks related to occupational health and safety, accidents, and working conditions, including employment form and working time arrangements.

These impacts are linked to the Group's strategy and business model, which relies heavily on collaboration with partners and suppliers delivering sports and well-being services. As the Group continues to evolve its strategy and business model in response to these material impacts, it may share best practices towards suppliers and partners and share best practices, as further discussed in subsections S2-1 and S2-4.

The following potential negative impacts on value chain workers have been identified:

Impact

- Potential indirect negative impact on working conditions of workers in the value chain, particularly in sports and fitness facilities, due to the absence of monitoring of working conditions

Impact

- Potential indirect negative impact on the health of workers in the value chain due to the nature of their roles and working conditions, which may increase the likelihood of accidents or other adverse events associated with the performance of duties.

The Group has not identified any material topics directly related to positive impacts on value chain workers. Group companies do not operate in regions where there is a significant risk of child labour or forced labour among value chain workers. Given the nature of its operations, the Group does not identify negative impacts on value chain workers in the context of the transition to greener and climate-neutral operations. The Group does not currently possess data concerning negative impacts on value chain workers nor has it developed an understanding of how workers with particular characteristics, those working in particular contexts, or those undertaking particular activities may be at greater risk of harm.

S2-1

Policies related to value chain workers

In 2024, the Benefit Systems Group did not have dedicated policies in place specifically addressing value chain workers. Selected matters concerning this group are incorporated into general documents in force at the Parent, including the Benefit Systems Group Code of Ethics – BS_WAY.

Two ESG Strategy commitments of the Group relate to supplier requirements:

- We integrate ESG criteria into procurement processes: Evaluation of key suppliers of materials and services based on defined ethical, social, and environmental criteria.
- We co-create responsible management standards among partners: Definition of ESG principles for partners tailored to their specific characteristics and an assessment of the percentage of partners operating in alignment with these principles.

As ESG practices continue to evolve within the Parent and other Group companies, the organisation has identified the need to formalise procedures related to the value chain. Accordingly, the Group plans to develop a Supplier Code of Conduct in the coming years, which will also cover value chain workers. Responsibility for the implementation of the Code will rest with the relevant business owners, in cooperation with the Compliance Officer and the Head of ESG and Public Affairs.

The Supplier Code of Conduct will structure and expand on the provisions of the Group Code of Ethics, which expects partners and suppliers to act with honesty, integrity, and ethical conduct, as well as to comply with rules governing fair competition.

In 2024, the Group did not identify any instances of non-compliance with international standards concerning value chain workers.

The Group intends to formally regulate its general approach to cooperation with value chain workers, measures to ensure the effective management of impacts on human rights, and the prohibition of forced labour and child labour through a due diligence policy called the Benefit Systems Group Responsible Business Conduct Policy, scheduled for adoption in 2025.

*UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

S2-2

Processes for engaging with value chain workers about impacts

GThe Group incorporates the perspectives of value chain workers primarily through indirect engagement, including dialogue and cooperation with owners, managers, and supervisors responsible for the operation of sports and fitness facilities. Direct engagement with value chain workers is not conducted comprehensively and is limited to specific groups, such as front-desk personnel at partner clubs.

In 2024, as part of the Group's management of sustainability-related impacts, risks, and opportunities, a stakeholder survey was conducted with the participation of supplier and partner representatives. Through a dedicated questionnaire, respondents provided input regarding, among other matters, the working conditions of their employees in the context of cooperation with Group companies. Responsibility for engaging supplier and partner representatives in the dialogue, carried out as part of the double materiality assessment, rests with the relevant business owners in charge of supplier and partner relations, in coordination with the ESG department.

Additionally, the Parent of the Group annually commissions an independent third-party survey, enabling representatives of partner sports and fitness facilities to share their views on cooperation with Benefit Systems S.A. and its designated representatives (account managers).

The results are analysed and translated into concrete actions, such as the reactivation of the sponsorship programme for MultiSport Partners and the development of a dedicated training programme.

The survey confirmed that overall satisfaction with cooperation with Benefit Systems S.A. remained high at 87%.

87% in 2024

84% in 2023

The Group also conducts annual Net Promoter Score (NPS) surveys among partner clubs to assess their willingness to recommend cooperation with Benefit Systems S.A.

In 2024, the overall NPS score was 42% (2023: 44%).

Respondents assessed their likelihood to recommend Benefit Systems S.A. Based on factors such as professional, helpful, and seamless cooperation; responsiveness and quality of communication with their account manager; and the timeliness and regularity of payments.

It is also standard practice for the Parent to hold regular meetings with representatives of sports and fitness facilities. Several thousand such meetings are held annually. Operational responsibility for these engagements rests with the management team and Business Partner Support Specialists, who oversee cooperation with partner clubs. These meetings serve to introduce new features, enhance existing solutions, share experiences from ongoing collaboration, and strengthen relationships with Benefit Systems S.A. partners.

The Group does not currently conduct a comprehensive assessment of the effectiveness of its engagement with value chain workers. In 2024, Group companies did not undertake steps to gain insight into the perspectives of workers that may be particularly vulnerable to impacts or marginalised.

S2-3

Processes to remediate negative impacts and channels for value chain workers to raise concerns

Companies within the Benefit Systems Group provide reporting channels for legal violations and whistleblower protection mechanisms in accordance with applicable whistleblower protection regulations. Detailed information regarding reporting procedures and the scope of protection applicable within individual Group companies is provided in the section 'Business conduct'.

For matters not covered by whistleblower protection regulations, value chain workers may raise concerns via dedicated helplines, contact forms, or email addresses published on the websites of individual Group companies.

The Benefit Systems Group Code of Ethics BS_Way stipulates that external stakeholders may contact the Compliance Officer of Benefit Systems S.A. directly.

The Parent plans to progressively implement the Code of Ethics in its foreign subsidiaries in 2025. The document will include guidance on ethical business conduct and detailed information on how external stakeholders, including value chain workers, may report breaches of law or ethical standards.

Currently, the Benefit Systems Group companies have not implemented mechanisms for systematically assessing whether value chain workers are aware of available reporting channels or whether they trust them to raise concerns or needs.

Although the Benefit Systems Group is not the direct employer of individuals working at partner facilities or for suppliers, it promotes collaboration with partners and suppliers that meet defined standards. This is achieved through the establishment of MultiSport partner quality criteria, declarations of compliance with business ethics principles, contractual provisions, and the option to report breaches of law or ethical standards as defined in the Code of Ethics.

The Parent expects all partners and suppliers to be familiar with, and adhere to, the ethical standards set out in the Code of Ethics.

S2-4

Taking action on material impacts on value chain workers

The Benefit Systems Group addresses its material impacts primarily through requirements concerning labour standards applicable to partners and suppliers, as outlined in subsection G1-2 in the section ‘Business conduct’, which covers the CSR questionnaire, contractual clauses, and documents scheduled for finalisation: a due diligence policy called the Benefit Systems Group Responsible Business Conduct Policy, and a supplier code of conduct.

The Group has not adopted dedicated action plans specifically targeting identified potential impacts, nor does it currently implement mitigation measures.

This is due to the Group not having direct control over working conditions within partner facilities, which limits its operational capacity to act in this area. Nevertheless, all positive initiatives undertaken by Benefit Systems S.A. in its relations with partners and suppliers, particularly those focused on the exchange of best practices, may be regarded as indirect mitigation measures. These activities are described in the section ‘Business conduct’ and form part of the ESG Strategy

Commitment of raising awareness and educating partners on sustainability.

From Factory companies in the Czech Republic and Slovakia plan to develop and implement actions related to value chain worker impacts by 2027. At this stage, no further actions are reportable in this respect, and no similar plans are currently in place in other Group companies.

The Group does not monitor compliance with occupational health and safety requirements or workplace standards at partner facilities directly, nor does it condition cooperation on the fulfilment of such criteria. The responsibility for meeting legal safety obligations and ensuring high service quality rests with the partners, as explicitly stated in contractual provisions. These contracts clearly stipulate that partners bear responsibility for compliance with safety regulations and for employing qualified personnel.

A supporting mechanism for assessing these aspects includes user feedback from MultiSport cardholders, which partners can access through the dedicated Partner Zone IT platform within the Benefit Club programme. These insights are made available to partners for their own review and continuous improvement. However, Benefit Systems does not use this feedback for formal partner monitoring or evaluation purposes. The partner relations team maintains regular contact with partners, focusing on educational engagement and relationship building. No audits or inspections of facilities are conducted. All user-reported issues concerning service quality, cleanliness, equipment functionality, or other matters (for example, hidden fees, limited access to services) are reviewed individually as part of the complaints handling process.

Each case is examined with due care, involving direct communication with the respective facility and a thorough assessment of the matter raised.

In 2024, the Group did not receive any notifications concerning negative impacts on value chain workers, including any human rights violations or incidents within the upstream or downstream value chain. Accordingly, no remedial actions were necessary.

S2-5

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The Group has adopted ESG Strategy 2024–2026 targets related to value chain workers. However, these targets do not meet the measurability criteria required under ESRS. The absence of ESRS-compliant targets stems from the fact that the current ESG Strategy was developed prior to the introduction of the new reporting standards and focuses on high-level initiatives rather than metrics aligned with ESRS and gap analysis. The methodology used to develop the ESG Strategy is described in the subsection ‘SBM-1 Strategy, business model and value chain’ of the ‘General information’ section. The Strategy is scheduled to be updated in 2025, following the completion of the first reporting cycle under the new ESRS framework. Due to the absence of dedicated policies and actions concerning material topics, effectiveness is not currently being assessed.

ESRS-S3

Affected communities (entity-specific disclosure)

This entity-specific disclosure covers all communities on which the organisation may have a material impact. These are:

- children, youth, seniors, and persons with disabilities – primarily supported through the activities of the MultiSport Foundation. Additional support is also provided by initiatives such as the Junior Positive Energy Academy (VanityStyle) targeting schools, the Dobry MultiUczynek social contribution programme (BSSA), Summer Game project (BSSA), and the Aktivní Česko Foundation (co-founded by MultiSport Benefit SRO), which promotes a healthy lifestyle,
- residents living in the vicinity of the Group's sports facilities,
- individuals interested in physical activity, who are not customers of the Group but benefit from activities organised by the Group.
- The Group has not identified any material negative impacts on these communities, nor material risks or opportunities arising from such interactions.

Actions resulting in positive impacts for local communities are described in the subsection 'Actions related to positive impacts'.

The double materiality assessment confirmed the Group's positive contribution to local communities through the organisation of sports programmes and events that enhance access to physical activity and foster social integration, particularly among children and youth. These impacts are primarily managed through the **MultiSport Foundation**, established by the Group's Parent.

Recognising the importance of engaging in social initiatives, the Group has implemented activities that, while outside its core business model, represent a natural extension of its stakeholder value-creation strategy.

Policies related to affected communities

The Benefit Systems Group has not adopted policies specifically addressing affected communities. The double materiality assessment did not identify any material negative impacts on this stakeholder group. As such, the Group does not currently plan to introduce a formal policy in this area.

Engagement with affected communities and mechanisms for raising concerns

Community perspectives influence decisions and actions related to the sports programmes and events implemented by the MultiSport Foundation that enhance access to physical activity and foster social integration, particularly among children and youth. When designing each programme, the Foundation considers the needs of:

- beneficiaries – such as children, seniors, persons with disabilities, and their proxies, PE teachers, and trainers,
- their representatives – such as municipalities, schools, and the National Institute for Senior Economy (KIGS),
- proxies – including professional athletes with or without disabilities.

When developing its programmes, the Foundation gathers input through in-person and online meetings, telephone conversations, and surveys. This feedback forms the basis for each programme framework. In addition, during programme delivery, Foundation coordinators remain in regular contact with beneficiaries, their representatives, and proxies to respond to suggestions and comments. The frequency of such engagement depends on the programme and ranges from several times per week to monthly interactions.

Each programme concludes with an evaluation, including participant surveys. The findings from these evaluations are used to implement improvements and ensure closer alignment with community needs. Since its establishment in 2021, the Foundation has observed mostly short-term effects – for example, improved physical fitness following a year of participation. Anticipated long-term impacts, such as fostering lifelong exercise habits or contributing to the creation of a healthier society, are expected to become measurable over the medium to long term.

Members of the Management Board of the MultiSport Foundation are responsible for overseeing the entirety of its programmes, including ensuring that beneficiaries, their representatives, and proxies are able to influence programme development and that their needs are addressed. Operational responsibility lies with the coordinators of individual programmes.

The Benefit Systems Group enables members of local communities or their representatives to report suspected breaches of law or ethics in relation to the activities of Group companies, as described in the section ‘Business conduct’.

At the MultiSport Foundation, such concerns may be submitted via a contact form available on the Foundation’s website or directly to the relevant programme coordinators. In 2024, the Group did not receive any formal complaints or grievances concerning the Foundation’s activities. Reports submitted primarily consisted of improvement suggestions, to which the organisation responded constructively and in good faith.

The Group does not verify the extent to which affected communities are aware of the available channels for raising concerns or expressing needs.

Actions related to positive impacts

Actions contributing to a positive impact on local communities at the Benefit Systems Group are primarily implemented through programmes managed by the MultiSport Foundation and delivered using its internal resources. In 2024, these included:

- **MultiSport classes with corrective and compensatory gymnastics elements** – a programme for preschool-aged children and primary school students (grades one to six) supporting the prevention of postural defects and promoting physical activity. The initiative is delivered in regions with limited access to modern sports infrastructure. The Foundation trained PE teachers, provided educational materials and sports equipment. In 2024, the programme's reach doubled.
- **Senior in Good Shape** – a programme offering seniors activities that support physical and mental well-being. It was developed in cooperation with the National Institute for Senior Economy and based on research and surveys targeted at seniors. The project received funding from the Ministry of Sport and Tourism.
- **MultiSport Active Schools** – a programme promoting physical activity among adolescents (aged 12–19), delivered through modern sports classes held at fitness clubs and sports events. Currently implemented in the provinces of Warsaw, Łódź and Katowice, with plans for national expansion.
- **Brimming with Sports** – a programme promoting physical activity among persons with disabilities, fostering inclusion and supporting development through engagement with paralympians and athletes with disabilities. The Foundation organises educational sessions in schools and has disseminated the children's book 'How the Best Play' along with accompanying teaching materials.

Examples of other actions to advance positive impacts include:

- **Junior Positive Energy Academy** – a project organised by VanityStyle Sp. z o.o. in cooperation with SWPS University, aimed at educating children about physical, mental and social health. The programme comprises three modules: Healthy Body, Healthy Mind, and Skills Development.

In its first edition (2023/2024 school year), 7,800 children from 364 schools participated. The evaluation report, prepared by SWPS and TUSer, confirmed the programme's effectiveness in shaping healthy habits among pupils.

In the second edition (2024/2025), 596 classes with 11,300 pupils have already registered.

- **Aktivní Česko Foundation** – a Czech foundation co-founded by MultiSport Benefit SRO, promoting healthy lifestyles, physical activity and well-being.
- **Dobry MultiUczynek** volunteer programme – an initiative of Benefit Systems S.A., implemented in collaboration with Benefit Systems International S.A. and the Volunteer Centre Association. In 2024, two editions of the programme were conducted, during which volunteers completed 24 community projects.
- **Summer Game project** – organised by Benefit Systems S.A., the initiative involves participants earning points for completing various tasks, such as online knowledge quizzes and workouts at fitness centres. Points may be exchanged for rewards or donated to charity. As a result, Benefit Systems donates funds to three public benefit organisations selected within the Summer Game initiative.

Each programme implemented by the MultiSport Foundation is subject to evaluation as outlined in the disclosure 'S3-2 Processes for engaging with affected communities about impacts'.

As part of its strategic commitments, the Group:

- promotes physical activity and a healthy lifestyle among diverse social groups,
- provides education and awareness-raising initiatives,
- allocated PLN 4,254,600 in operating expenditure (OpEx) in 2024 for actions targeting the stakeholders listed in this section, with the 2025 budget planned to increase to PLN 6,082,266.

Targets related to positive impacts

The Benefit Systems Group's goals for advancing its positive impacts on local communities are set out in the Articles of Association of the MultiSport Foundation. These goals apply to all social groups and are designed as long-term commitments.

Commitments and objectives related to local communities are also included in the Group's ESG Strategy: Commitment	Main objective
We promote physical activity and healthy lifestyles across various social groups.	At least 40,000 hours of free sports activities for children, young people, and seniors to be delivered between 2024 and 2026 by the MultiSport Foundation and foreign subsidiaries.
	At least 50,000 beneficiaries per year of free programmes and events engaging diverse social groups.
	At least 20 annual initiatives (programmes, campaigns, actions) designed to engage various social groups.
We educate users, customers, and the wider community.	At least 100,000 thousand direct beneficiaries annually of the Group's external educational activities.

Baseline values and progress towards the MultiSport Foundation's objectives in 2024

Objective	2023 baseline	2024 progress
Free sports classes for children, youth and seniors under MultiSport Foundation activities (number of hours). Main objective encompassing other Foundation activities, including:	**6,000 hours**	**36,500 hours**
Implementation of Active MultiSport Schools (number of hours)	2,273 hours	2,185 hours
Implementation of Senior in Good Shape (sports classes for seniors in fitness clubs and outdoors)	200 people	58,500 people
Implementation of MultiSport classes incorporating corrective and compensatory exercise component	2,218 hours	5,000 hours
Other:		
Organisation of events and educational meetings in schools, institutions, NGOs (number of beneficiaries)	30,000 people	95,800 people
Events for diverse social groups (number of events)	8 events	23 events
Training for teachers on the physical and mental well-being of children and youth	500 people	1,000 people

Progress is monitored and reported by programme coordinators to the Foundation's Management Board. For externally funded or co-funded programmes, the Foundation maintains detailed records on the achievement of targets, which are submitted to grant providers. Progress is monitored monthly, with summary reviews conducted on a semi-annual and annual basis. Baseline values for measuring progress are based on the previous year's data.

In addition to quantitative and measurable targets – such as the number of children participating in free sports classes or improved fitness levels following a year in a physical activity programme – the Foundation also pursues long-term objectives that can only be assessed over time, such as fostering a lifelong habit of physical activity.

The Foundation does not directly engage local communities in monitoring performance against its targets. However, transparency is supported indirectly through the annual publication of its activity and financial reports on the Foundation's website. Additionally, key data on programme implementation are shared on a regular basis via the Foundation's social media profiles.

ESRS S4

Consumers and end-users

SBM-3

Material impacts, risks and opportunities and their interaction with strategy and business model

To ensure consistency and transparency in classification, the following outlines the allocation of customer groups to the categories defined in the ESRS for the purpose of this report. These groups are subject to material impacts from the Group:

- **End-users (B2B2C)** – employees of B2B customers, namely current and potential end-users who access services provided by Group companies under service agreements, and who have access to the products offered by them.
- **End-users (B2C)** – natural persons who independently purchase the Group's products or services, such as gym passes, as well as individuals exposed to the Group's marketing content.

According to the ESRS, both groups fall under category (iii) – users who depend on accurate and accessible product- or service-related information to avoid potentially damaging use of a product or service.

In addition, certain parts of this section refer to **B2B customers** (hereinafter referred to as "customers"), who are employers entering into agreements for the provision of employee benefits for their staff. While not classified as consumers or end-users under the ESRS, their role as intermediaries in the delivery of benefits and their influence over decisions regarding the use of the Group's services justify their inclusion in the contextual analysis of the Group's impacts.

Based on the double materiality assessment conducted in accordance with ESRS 2 IRO-1, the Group did not identify any consumer or end-user groups particularly vulnerable to elevated risks of negative impact related to the products and services offered.

According to the Group's data, the end-users materially affected by the Group are primarily women and men aged 15–44, with higher education, residing in cities with populations exceeding 100,000. The Group provides both business customers and end-users with solutions in the areas of healthy lifestyles, well-being, and employee benefits. This business structure generates material impacts, risks and opportunities in the following thematic areas:

Occupational health and safety – the operation of sports and fitness facilities is associated with the risk of accidents and injuries, even where the highest OHS standards are maintained,

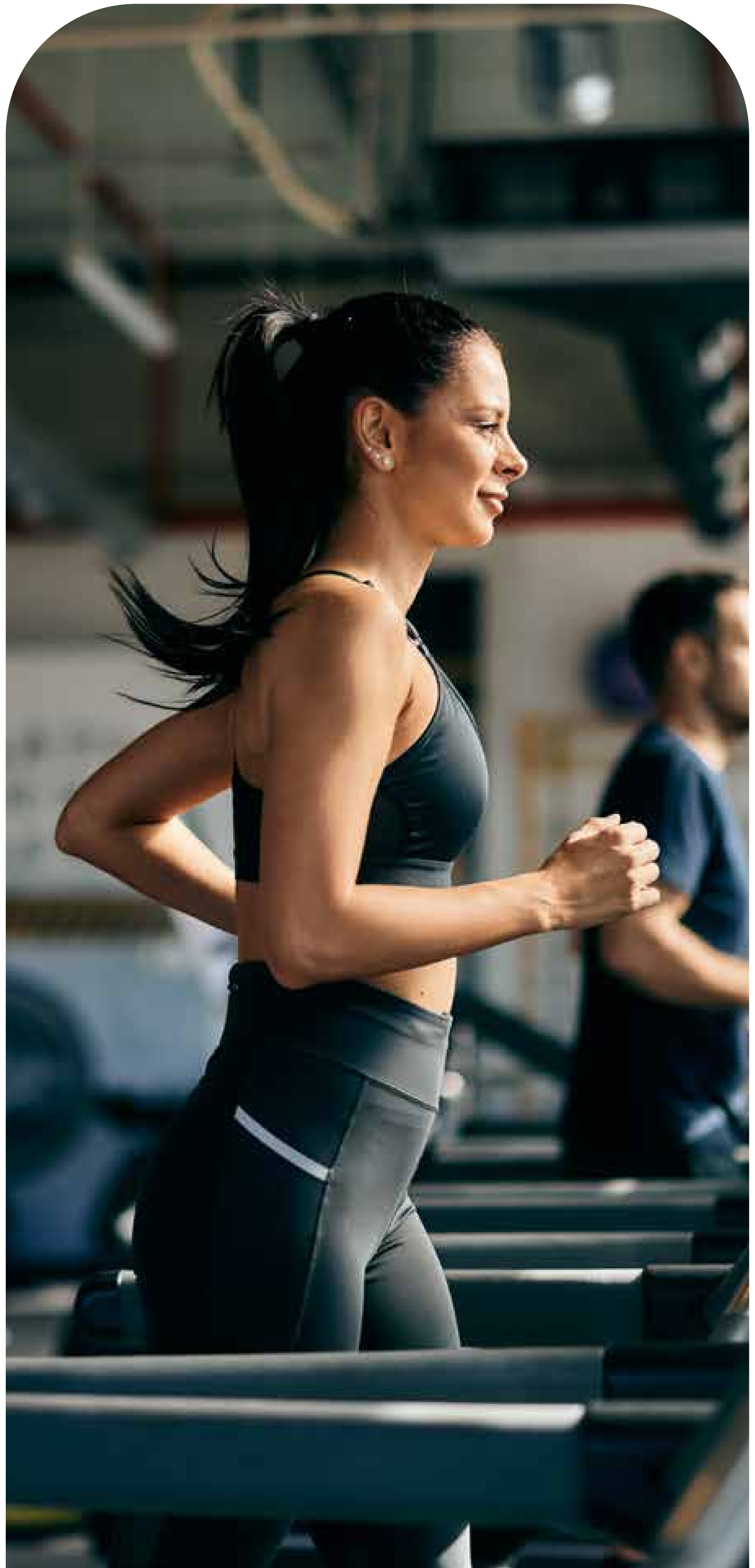
Privacy protection and cybersecurity – end-user interaction with websites and applications, as well as contract execution, entails responsibility for personal data processing,

Impact of external factors – the business model is sensitive to demographic shifts, public health trends, and potential crises such as pandemics.

The strategic priorities, described in the 'General information' section, focus on the development of current services, products, and the fitness club offering, thereby enhancing the positive impact on the health and well-being of end-users.

Identifying material impacts, risks and opportunities allows the Group to optimise its business model by:

- improving the standards of products and services offered,
- responding to evolving social needs related to health, lifestyle and demographics,
- minimising risks – the Group continuously enhances safety systems, data protection policies and compliance procedures to prevent privacy breaches and other threats associated with operational activities and the external environment..



The double materiality assessment has identified four potential negative impacts on end-users. These are:

Impact	Nature of impact
Potential impact on the safety and health of users of both proprietary and partner-operated sports and fitness facilities due to inadequate management of safety procedures or inadequate maintenance of air conditioning systems, which may lead to health risks, serious injuries, or accidents.	The impact may be systemic and widespread, as it relates to safety management standards across a broad network of sports and fitness facilities.
Potential impact on users' health due to misleading or incomplete information in content related to physical and mental health, created by individuals lacking appropriate qualifications. Inadequate training and outdated knowledge may affect the quality of health and fitness services, with implications for user well-being.	The impact may be incidental, associated with isolated cases of content being created by inadequately trained individuals.
Potential impact on the right to privacy of users resulting from breaches of personal data privacy and security.	The impact may be systemic – data protection issues are typically broad in scope, and cyber threats and data breaches (for example due to hacking) are prevalent across multiple sectors.

The Group has identified one major positive impact on end-users:

- Impact on physical and mental health through increased physical activity, improved fitness and enhanced well-being enabled by the Group's products and service.

The actions undertaken by the Group companies in relation to this impact, which result in positive outcomes, are described in subsection S4-4.

These actions are conducted primarily in Poland, but also on the international markets in which the Group operates. The stakeholders affected by this positive impact include the two end-user groups presented at the beginning of the section.

Material risks arising from the impacts and dependencies related to the end-users of the Group, identified through the double materiality assessment, include:

- Risk of breaches of end-users' right to privacy, particularly in relation to personal data protection. Data breaches may lead to unauthorised access to sensitive information and may result in severe legal, financial and reputational consequences for the Group.

- Risks associated with potential restrictions on the operation of sports and fitness facilities during a future pandemic. These include the consequences of complying with stringent sanitary requirements, maintaining social distancing, or suspending operations. Such disruptions could lead to reduced service availability, a decline in end-user numbers, and increased operating costs associated with the implementation of necessary health and safety measures. Additionally, there is a risk of revenue loss due to suspended operations, as well as potential challenges in returning to business as usual following the lifting of restrictions.

- Risk associated with an ageing population and demographic shifts, which may affect demand for its services (MultiSport). This risk is associated with the need for a flexible response to evolving user expectations, which may require adjustments to the Group's product and communication strategies.

S4-1

Policies related to consumers and end-users

The Group does not currently maintain a single, unified, and comprehensive policy governing customers and end-users. These matters are managed and regulated through a number of internal policies, procedures and regulations.

Internal regulations in place at the Parent, including the Code of Ethics and the Diversity, Equity and Inclusion (DEI) Policy, extend their commitments to end-users.

Material impact identified during the double materiality assessment	Policies	Scope	Key content	Responsible executive within the Group
Health and safety	Set of instructions, policies and procedures	Applies to end-users of fitness clubs	Define the principles for the safe use of fitness facilities	Managing Director (Fitness Branch), Director of Investment Execution and Maintenance
Access to products and services	Policies applicable to key product lines	Applies to all users of the Group's services and platforms	Define the rights and obligations of individuals using the Group's offering	Directors of the respective product lines: MultiSport, MultiLife, MyBenefit
Privacy	Privacy Policy	Applies to all users of the Group's services and platforms	Specifies the principles governing the processing and protection of users' personal data in accordance with the GDPR and other applicable legislation. The document outlines the categories of data collected, purposes of processing, data subject rights, and data security measures	Head of Legal
Privacy	Cookie Policy	All users of the Group's online services	Regulates the use of cookies on the Group's websites, specifying their types, functions, and the options available to users for managing cookie settings	Head of Legal

In the area of the material topic of access to (high-quality) information, there is no formal policy in place. However, relevant provisions are included in the contracts concluded with experts. Further details are provided in subsection S4-4.

In the Fitness Branch, minor protection standards are in place to ensure a safe environment for children, eliminate the risk of harm, and promote respect for and the protection of their rights. These standards also define the responsibilities of staff, guardians, and users of the fitness clubs. The implementation and oversight of these standards are the responsibility of club management, and personnel undergo regular training in child protection policies and the identification of signs of harm.

The above-mentioned policies are available on corporate websites, with the website address also indicated in the agreement signed with the customer. Users may also access the internal regulations via the product-related applications..

Human rights

The Group does not currently have a dedicated human rights policy. However, actions related to human rights protection are implemented under existing internal regulations and compliance processes.

In 2024, no incidents of human rights violations were reported within the Group's own operations or its value chain, in accordance with applicable ethical standards and the international regulations referenced in the ESRS.

The Diversity, Equity and Inclusion (DEI) Policy was adopted by the Management Board of the Parent in 2023.

Process for considering the interests of end-users

The Group considers the interests of consumers and end-users by designing policies, procedures, and regulations that ensure high-quality service and safeguard the transparency and safety of the business relationship. Documents such as product regulations, privacy policies, and customer service standards are developed to provide users with optimal conditions for using the services offered.

S4-2

Processes for engaging with consumers and end-users about impacts

The Parent and its subsidiaries actively engage with customers and end-users through recurring surveys on their experiences and opinions (satisfaction surveys, Net Promoter Score (NPS) surveys, exit interviews, etc.), incorporating their perspectives into decision-making processes. As part of the double materiality assessment, customers were also engaged in dialogue, indirectly expressing their views on the Group's impact on B2B2C users – this dialogue addressed topics such as safety, privacy, inappropriate treatment, and the risk of accidents.

The communication mechanisms described below are designed not only to collect feedback but also to support the identification and monitoring of material impacts on users. In particular, these mechanisms enable to:

- promptly identify risks arising from the inadequate implementation of safety standards in sports and fitness facilities, enabling the adoption of remedial actions to minimise the risk of accidents or injuries,
- monitor the quality of information provided,
- respond to alerts concerning personal data breaches, which is essential in managing the risk of privacy violations affecting users.

Group companies responsible for the products offered by the Group engage in both direct and indirect communication with customers and end-users. Communication is conducted through various channels, including:

Type	Frequency	Channels	Most senior position responsible for communication with customers or end-users
Communication channels (serving as the primary platforms for collecting feedback and user input)	Ongoing	Customer Service Office/helpline	Head of Customer Relations
		Email communication	Director of Sales and Customer Service
		Contact forms on corporate websites	Depending on the source and nature of the communication Head of Relations Director, Product Line Directors, Director of Investor Relations, Director of Partner Relations, Head of Legal, Sales Director
		Social media platforms (Facebook, Instagram, TikTok, etc.)	Head of Communications, Marketing Director
Surveys and research	Annual NPS survey and MultiSport Index (user survey)	Regular customer satisfaction surveys, Net Promoter Score (NPS), which assesses the likelihood of recommending cooperation with the company, and online surveys collecting structured data on user preferences, satisfaction, and potential areas for improvement	Head of Analytics
		End-user satisfaction surveys. Conducted with individuals who have provided prior consent	Head of Analytics

The type and frequency of engagement with customers and end-users are adapted to the specific operational context of each Group company, ranging from daily interactions to periodic large-scale satisfaction surveys.

The effectiveness of interactions with customers and end-users is assessed based on:

- results of satisfaction surveys and NPS assessments,
- analysis of key performance indicators (KPIs), including the volume of enquiries and responses over a given period, average response time, and customer retention rates,
- user and customer feedback provided via online platforms and social media.

No groups have been identified as being particularly vulnerable to impacts or marginalised.

S4-3

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

The Group companies have implemented consumer and end-user concern reporting channels adapted to their operational contexts. These processes support remedial actions in areas such as health and safety in sports and fitness facilities, data privacy, and the quality of health-related content. End-users may raise concerns – regardless of their nature – through various available communication channels. In cases involving potential violations of law or ethical standards, users may contact the Compliance Officer directly via a dedicated email inbox used for reporting suspected legal or ethical violations. Issues submitted through this channel are duly addressed and investigated. Matters relating to personal data may be reported directly to the Data Protection Officer.

Depending on the Group company, the following communication channels are used:

- contact with a designated customer representative,
- helpline,
- dedicated email addresses, including those of the compliance function and the Data Protection Officer,
- traditional mail,
- chat functionality on the website.

The availability of these channels is supported by IT systems and complaints handling procedures. Customer service staff are appropriately trained. To ensure ease of access, the Group's corporate website includes a dedicated 'Help and support' section which provides information on available reporting channels, including email addresses, helpline numbers, and contact forms. Reported and resolved issues are tracked and monitored through a suite of processes and tools that support effective case management and enable evaluation of channel performance. These include, depending on the company:

- dedicated report management platform,
- monitoring of key performance indicators, including time to response and time to resolution,
- satisfaction surveys conducted upon case closure,
- service process audits and reviews,
- periodic assessments of front-line staff performance based on user interaction analysis, KPI outcomes, and user feedback.

Once a report is received, the responsible employee analyses the issue and provides a response in line with applicable procedures. Where necessary, the case is referred to the appropriate department. Business customer service also encompasses aspects of cooperation, billing, contract negotiation, and service implementation.

The mechanisms that provide for or support remedial and corrective measures in response to negative impacts are defined in contracts, internal rules, and procedures (detailed in subsection S4-1), and are described in the Group's operational practices (subsection S4-4). End-users may submit concerns through the available communication channels, and cases are handled in accordance with established procedures (S4-3). In exceptional circumstances, compensatory measures may be applied.

- To evaluate whether end-users are aware of the concern-raising mechanisms and whether they trust them to express their concerns or needs, the Group companies apply the following measures:
- surveys,
- analysis of submissions and service quality,
- feedback from first-line staff,
- usability testing and customer journey mapping,
- analysis of communication and visibility of available reporting channels.

The Group does not currently operate a unified, dedicated policy for the protection of end-users submitting reports of irregularities.

S4 4

Taking action on material impacts on consumers and end-users

In 2024, the Group companies addressed selected material impacts, risks, and opportunities related to customers and end-users. Insights into these impacts, risks, and opportunities were obtained through the double materiality assessment, which the Group treats as a point of departure for identifying areas requiring action. Based on the outcomes of this analysis, the Group has scheduled initiatives for 2025 and subsequent years to mitigate risks and pursue opportunities, incorporating short-, medium- and long-term actions.

A description of how the Group ensures that processes to remedy material negative impacts are accessible and effective is provided in subsection S4-3.

Occupational health and safety

The Group has implemented a range of initiatives aimed at minimising the risk of accidents and ensuring high health and safety standards in sports and fitness facilities. **Key actions include:**

- Monitoring and safety audits in sports and fitness facilities: the Group conducts regular HVAC system audits and inspects the technical condition of sports equipment in clubs to ensure compliance with hygiene requirements. Daily site inspections by staff cover ventilation, fire protection systems and fitness equipment. The introduction of a fault reporting system enables users to promptly report issues for resolution.
- Air conditioning system monitoring: a team of experienced technicians performs air conditioning audits, with the objective of eliminating system malfunction risks by the end of 2025.
- Water quality and sanitation: regular testing of water samples in clubs ensures sanitary safety for users.
- Building systems and evacuation safety: facilities are equipped with thermostatic fixtures, ventilation systems, emergency lighting, and devices that prevent electric shock. Projects are designed with safe evacuation in mind, and all clubs are fitted with firefighting equipment and alarm systems.

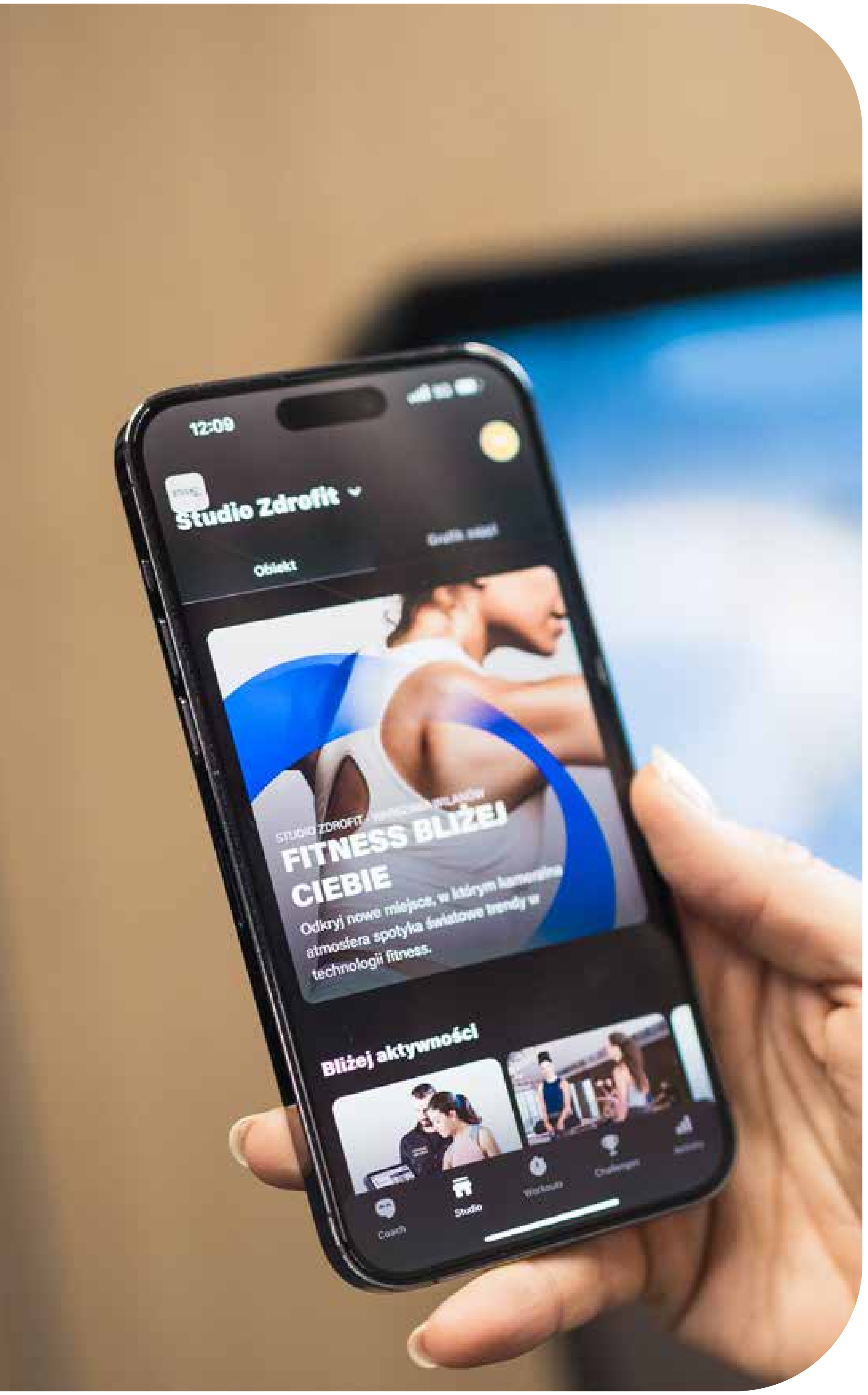
These actions are ongoing and are subject to periodic reviews to assess the effectiveness of the procedures implemented.

Access to (quality) information

The Group undertakes a number of initiatives to minimise the likelihood of providing inaccurate information (for example, to end-users during workshops, training sessions, and events) or engaging experts who lack appropriate qualifications. **Key actions include:**

- Expert knowledge: experts (trainers, psychologists, dieticians) are required to provide services professionally, in accordance with legal requirements and the current state of knowledge. Content is created exclusively by individuals holding relevant qualifications, confirmed by academic or professional credentials. Experts are vetted through a multi-step process involving internal subject-matter reviews, CV and certification checks, references, and publicly available information.
- Training and upskilling: content creators and training facilitators are regularly updated on the latest research and industry standards.
- Safety of well-being service users and customer information: event participants are required to disclose any health contraindications to trainers. Customer and end-user documentation clearly states that training, health or dietary guidance does not constitute medical advice.
- Evaluations and feedback: the Company regularly collects user feedback, evaluating both the facilitator and the substantive value of sessions. Improvements are introduced based on results monitored by Benefit Systems S.A.
- Educational projects: the Group implements educational initiatives targeting both users and customers.

These actions are ongoing for expert engagement requirements and carried out regularly for training, user evaluations and project implementation. Effectiveness is measured through user ratings and the number of participants in educational programmes.



Access to products and services

The Benefit Systems Group undertakes measures to ensure broad access to services that promote physical and mental health, responding to changing demographic trends and consumer preferences. **These actions include:**

- Expanding the offering that supports healthy lifestyles, well-being and physical activity: MultiSport cardholders have access to a broad network of professional sports and fitness facilities, enabling regular physical activity. In addition, the Group organises challenges and campaigns encouraging physical engagement,
- Expanding the offering for older age groups: introduction of the MultiSport Senior card and dedicated health programmes tailored to individuals aged 60+,
- Dedicated well-being solutions: the MultiLife programme provides access to mental health specialists, mindfulness programmes, nutritional guidance and physical activity, as well as workshops and expert-led sessions,
- Support for B2B customers in employee well-being strategy development: provision of tools such as the Wellbeing Score and advisory support in designing well-being programmes tailored to organisational needs,
- Flexible employee benefits systems: the cafeteria platform allows users to customise their benefits, including sport classes, health packages and educational programmes.

These ongoing actions help the Group to increase the number of beneficiaries and to strengthen its positive impact on users' health by addressing their diverse needs and expectations. This, in turn, supports the delivery of long-term strategic objectives related to health promotion and well-being, while also advancing the Group's business goals.

Privacy

Personal data protection and user data confidentiality are the Group's strategic priorities. The Group undertakes a range of initiatives aimed at minimising the risk of personal data breaches and associated risks. **Key actions include:**

- Security systems: investments in technologies such as encryption, data loss prevention (DLP) systems, and multi-factor authentication (MFA),
- Security monitoring: regular external audits of IT systems, incident analysis, and the implementation of procedures ensuring alignment with evolving legal requirements,
- Education: programmes aimed at increasing awareness among employees and partners regarding data protection and incident response.

Privacy-related measures are carried out on an ongoing basis – including short-term implementation of safeguards, as well as medium- and long-term strategies focused on enhancing data protection procedures. Effectiveness is monitored through IT security audits, incident analyses, and the results of training sessions and awareness surveys.

The types of resources allocated by the Group to current and planned sustainability-related initiatives include financial, human and technological resources. Resources related to actions concerning material topics related to end-users are planned and budgeted for within the operational costs of multiple departments. Due to the need to protect commercially sensitive information, the Group does not disclose detailed data regarding these resources.

S4-5

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The ESG Strategy for 2024–2026 includes key topics related to end-users that were identified as strategic prior to the double materiality assessment conducted in accordance with ESRS requirements. The year 2024 has been adopted as the baseline, and the target implementation period extends until the end of 2026. Baseline values for the targets will be derived from data available as at the end of 2024, which will be fully analysed after the publication of the sustainability statement.

The presentation of results for 2024 and 2025 and their comparison will be possible in the 2025 statement. The supporting targets are expressed in relative terms. The strategy is scheduled to be updated in 2025 following the completion of the first reporting cycle in accordance with the new ESRS standard, and based on the results of the double materiality assessment, gap analysis and ESRS requirements concerning the measurability of targets.

Material topic	Organisational coverage	Commitment	Main objective and supporting objectives	Supporting objective	Metrics
Access to (quality) information	Benefit Systems Group	Education of users, customers, and the wider community	At least 100 thousand direct beneficiaries annually of the Group's external educational activities.	At least 7-10 educational projects per year targeting users, customers and other external stakeholder groups.	Number of projects and number of beneficiaries
Privacy	Benefit Systems Group	Ensuring the protection of user and customer data	Provision of security training, including guidance on personal data protection, for all BS Group employees.		Percentage of workforce traine
			Ensuring a high level of information security regarding customers, users, and partners. No incidents involving theft of confidential information.	Supporting objective: No substantiated claims from customers concerning the processing of confidential information.	Number of substantiated claims from customers
Access to products and services	Poland segment	Promoting physical activity and healthy lifestyles across various social groups	At least 50 thousand beneficiaries per year of free programmes and events engaging diverse social groups.		Number of beneficiaries
			At least 20 annual initiatives (programmes, campaigns, actions) designed to engage various social groups.		Number of initiatives
	Poland segment	Fostering well-being and wellness of employees, users, and customers	Increase by 5% the proportion of surveyed users who believe the Group's products support well-being (increase within three years compared to the 2024 baseline).		Increase in user proportion
			Increase by 5% the proportion of surveyed B2B customers who believe the Group's products support well-being (increase within three years compared to the 2024 baseline).		Increase in user proportion
	Poland segment	Promoting mental well-being of employees, users, and customers	Increase by 5% the proportion of surveyed MultiLife users who believe the programme supports their mental well-being (increase within three years compared to the 2024 baseline).		Increase in user proportion

The targets related to privacy are consistent with the provisions of the Personal Data Protection Policy and the Privacy Policy.

The process of defining targets under the current ESG strategy was informed by an analysis of data collected through satisfaction surveys, Net Promoter Score (NPS) questionnaires, interviews, meetings, workshops, as well as market research and industry reports. Priority was given to matters of greatest relevance to customers and users, such as data protection, mental and physical well-being, and education. The engagement of end-users in the process of setting the targets is ensured through various forms of dialogue and collaboration. These include the organisation of workshops and focus groups, as well as ongoing communication with a designated account manager, enabling regular collection of feedback and suggestions. The outcomes of these interactions are systematically analysed and inform the prioritisation and strategic development pathways, thereby ensuring that the established targets remain aligned with stakeholders' actual expectations.

For a detailed description of the methodology applied to develop the strategy, see the 'General information' section.

Currently, with respect to end-users, no specific targets have been set for selected material areas, such as expert competence, health and safety (including aspects related to air conditioning safety), or risks associated with demographic shifts. These areas are managed within the framework of existing policies and operational activities. A decision whether to establish dedicated targets for these areas will be made during the update of the ESG strategy following the end of the first reporting year. No ambition levels have been set for the aforementioned areas.

The process for monitoring policies and the effectiveness of actions related to those material topics for which output-oriented targets have not been defined covers areas such as:

- Health and safety – relevant metrics include the number of accidents and near-misses, and are subject to systematic review to implement preventive measures and improve safety standards.
- Expert competence – governed by applicable formal requirements and actions described in the relevant section, including the verification of qualifications and the provision of training.
- Review of end-user requests and complaints – monitoring of feedback and suggestions submitted by users to identify areas for improvement, including those related to health and safety and staff competence.
- Satisfaction surveys among customers and users – analysis of the Net Promoter Score (NPS) and trends in customer opinions, enabling an assessment of service quality and trust levels, also in terms of the ability to keep pace with demographic changes.

04. Business conduct

ESRS G1

Business conduct

As part of the double materiality assessment, a positive impact was identified in the following area:

- Impact on corporate culture through the implementation and adherence to the Code of Ethics and good practices within the Poland segment, which positively affects both internal and external stakeholders.

In view of this impact, the Group discloses information relating to business conduct policies, corporate culture, and the management of its relationships with suppliers.

G1-1

Business conduct policies and corporate culture

The Benefit Systems Group is guided by the principles of honesty, integrity, and ethical conduct. The Group's strategic approach to ethical and responsible management is outlined in the ESG Strategy for 2024–2026 under the Business pillar.

The organisation has committed to:

- strategically manage the ESG area across the Group, e.g. through the effective governance of ethics,
- ensuring the protection of user and customer data,
- Integrating ESG criteria into procurement processes.

The Group's mission is to promote an active lifestyle, based on the belief that increased physical activity leads to greater energy, better health, enhanced well-being, and ultimately – an improved overall quality of life.

Benefit Systems S.A., as a member of the global B Corporation Movement, is committed to maintaining a balance between the pursuit of its business objectives and social engagement. The Company's approach to ethical and responsible business practices is articulated in several key documents, including the Benefit Systems Group Code of Ethics – BS_WAY (the "Code of Ethics").

Business conduct and corporate culture at the Benefit Systems Group are further addressed by a set of documents that complement the Code of Ethics. Responsibility for their adoption and implementation lies with the Management Board of the respective Group company.

Selected documents relating to responsible and ethical business conduct:

Document name	Companies that have implemented the document
Compliance Policy	Benefit Systems S.A.
Diversity, Equity and Inclusion (DEI) Policy	Benefit Systems S.A.
Good Practice Guidelines for Addressing Cases of Workplace Bullying and Discrimination	Benefit Systems S.A.
Procedure for Anonymous Reporting of Suspected Violations of Law, Internal Regulations and Ethical Standards	Benefit Systems S.A.
Personal Data Protection Policy	Benefit Systems S.A.
Privacy Policy	Benefit Systems S.A.
Diversity Policy with respect to Members of the Supervisory Board	Benefit Systems S.A.
Diversity Policy with respect to Members of the Management Board	Benefit Systems S.A.
Code of Ethics	Benefit Systems S.A., Benefit Systems International S.A. and Fit Invest International Sp. z o.o. Vanity Style sp. z o.o. and Form Factory s.r.o have adopted their own codes of ethics, whose provisions ensure consistency in the ethical approach across the Group. At foreign entities of the Benefit Systems Group, the implementation of the Code of Ethics and other compliance-related documents has been scheduled for 2025.
Internal Whistleblowing Procedure for Reporting Violations of Law within the Scope Set Out in the Whistleblower Protection Act	Implemented at the following entities in accordance with the provisions of the Polish Whistleblower Protection Act: Benefit Systems S.A., Benefit Systems International S.A., and VanityStyle Sp. z o.o. Reporting procedures have also been implemented in accordance with local regulations transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law in the following countries: Czech Republic, Slovakia, Bulgaria, and Croatia: MultiSport Benefit s.r.o. (CZ), Form Factory s.r.o. (CZ), Benefit Systems d.o.o. (HR), Benefit Systems Slovakia s.r.o. (SK), Benefit Systems Bulgaria OOD (BG), Next Level Fitness OOD (BG)
Compliance Policy	Form Factory s.r.o. (CZ)

Benefit Systems Group Code of Ethics

The Benefit Systems Group Code of Ethics – BS_WAY outlines the ethical standards, values, and principles of conduct embraced by the organisation. Its provisions define the areas of significance to the Group, including respect for human rights, anti-corruption efforts, the prevention of conflicts of interest, confidentiality and data protection, social engagement, and responsible environmental stewardship. The Code of Ethics promotes conduct aligned with the organisation's core values of respect, responsibility, and cooperation.

The Code of Ethics is made available to all stakeholders via the website at: benefitsystems.pl. Every employee and associate of Benefit Systems S.A. is required to familiarise themselves with the Code of Ethics and adhere to its principles. The same rule applies to employees and associates of other Group companies where the Code of Ethics has been implemented.

Compliance Policy

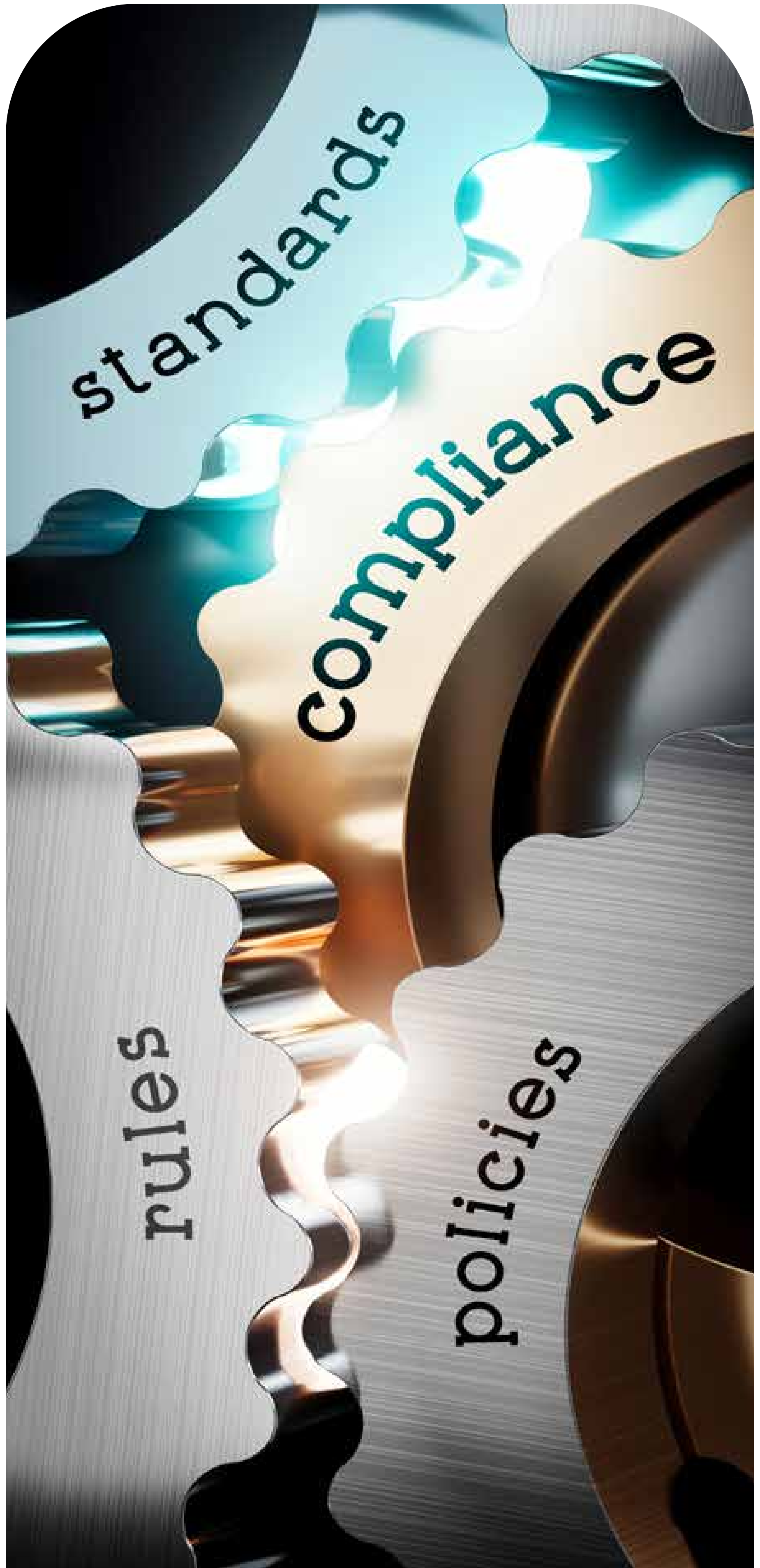
The Compliance Policy is a fundamental framework governing Benefit Systems S.A.'s activities in the area of compliance risk management, which include identifying, assessing, mitigating, and monitoring risks, shaping the Company's image as an ethical business, and assigning roles and responsibilities within this area

Anti-Corruption Policy

Benefit Systems S.A. and selected companies of its Group have formally adopted anti-corruption regulations in line with the United Nations Convention against Corruption. The Anti-Corruption Policy comprehensively defines the understanding of corruption at the Parent Benefit Systems S.A., and clearly states the organisation's zero-tolerance approach to any form of corrupt practices.

It also describes the potential consequences for both the organisation and individuals should they engage in corrupt activities. The anti-corruption provisions apply to all employees and associates.

Business partners are likewise expected to be familiar with the Policy and to adhere to its provisions. Benefit Systems S.A. assumes that corruption risk exposure is particularly relevant for Management Board members and middle management staff in the areas of customer relations, partner relations for MultiSport, MyBenefit, and MultiLife products, as well as procurement.



Diversity, Equity and Inclusion (DEI) Policy at Benefit Systems S.A.

The DEI Policy emphasises the value of diversity as a source of inspiration for both the Parent and the entire Group. It is grounded in the values set out in the Code of Ethics and is implemented in accordance with the ESG Strategy for 2024–2026.

Good Practice Guidelines for Addressing Cases of Workplace Bullying and Discrimination at Benefit Systems S.A.

The procedure is described in greater detail in the 'Own workforce' section of this statement.

Privacy Policy and Personal Data Protection Policy

WBenefit Systems S.A. has in place internal policies and procedures governing data protection, as well as public documents addressed to external stakeholders.

The key internal document is the Personal Data Protection Policy, which governs data processing in compliance with the rights of data subjects.

An essential element of this framework is also the Privacy Policy, through which the Company communicates with individuals whose data it processes, such as customers and users of its products. In pursuit of the objectives of transparency and broad accessibility of information, the Privacy Policy is published on the Company's websites.

The data protection framework in place comprehensively governs the handling of data, including special categories of data, without providing for any exceptions. In accordance with its principles, any data subject may submit a request to the Company seeking to exercise their rights. Additionally, the Company facilitates the exercise of data protection rights by end-users providing them with dedicated communication channels. Users also have the option to contact the Company's appointed Data Protection Officer with regard to matters relating to the processing of their personal data.

Availability and awareness of policies and procedures

The Group makes a number of its regulations related to business ethics, diversity, and the remuneration of management and supervisory bodies publicly available via its corporate website, in accordance with the applicable legal obligations and the Best Practice for WSE Listed Companies (the "Best Practice"). The anti-corruption provisions are accessible to employees and associates of Benefit Systems S.A. and other Group companies through the corporate intranet. Corporate culture is actively fostered through internal communication channels, including team-bonding and development initiatives, such as workshops and meetings.

Information on expected business conduct is systematically communicated to all new employees of Benefit Systems S.A. and VanityStyle Sp. z o.o. during their onboarding training. Furthermore, once a year, employees' knowledge is refreshed and updated through e-learning modules covering the Code of Ethics, the Anti-Corruption Policy, the Gifts and Hospitality Procedure, and the Conflicts of Interest Procedure.

Implementation of policies

In the case of subsidiaries, the selected codes, policies, and procedures are implemented progressively and proportionately, guided by the principle of materiality, with priority given to entities of strategic importance to the Group's business.

At Benefit Systems S.A., a Works Council is in place, representing employees' interests before the Management Board and serving as a consultative body for various topics and planned changes undertaken by the Company.

Protected whistleblower reports

A number of company of the Benefit Systems Group are subject to national regulations transposing Directive (EU) 2019/1937 on the protection of whistleblowers, or other equivalent legal frameworks safeguarding individuals who report violations. These companies have adopted the legally prescribed scope of protections for whistleblowers, along with procedures for swift, independent, and impartial investigation of business conduct-related breaches.

The internal whistleblowing procedures for reporting violations of law within the scope set out in the whistleblower protection regulations were developed in 2024, consulted with the Works Council and approved by the Management Board. At foreign subsidiaries, such procedures have been implemented in accordance with the requirements of local whistleblower protection laws.

Entities subject to whistleblower protection obligations within the Group include:

- companies registered in Poland:
  - Benefit Systems S.A.
  - VanityStyle Sp. z o.o.
  - Benefit Systems International S.A.
  - FIT Invest International S.A.
- foreign companies:
  - Multisport Benefit s.r.o. (CZ),
  - Form Factory s.r.o. (CZ),
  - Benefit Systems d. o. o. HR
  - Benefit Systems s.r.o. (SK),
  - Benefit Systems OOD (BG),
  - Next Level Fitness ODD (BG)

Work-related whistleblower reports may concern violations of law in the areas specified in Art. 3.1 of the Polish Whistleblower Protection Act.

Reporting channels available at the Parent company:

1. Whistleblower reporting platform – external system enabling the submission of reports either in writing or verbally – available at benefitsystemspl.whistlelink.com
2. Written submissions – reports may be submitted to the designated correspondence address (marked "Confidential"):
   - 2.1. Compliance Officer, Benefit Systems S.A. Plac Europejski 2, 00-844 Warsaw, Poland
   - 2.2. Ethics Committee, Benefit Systems S.A., Plac Europejski 2, 00-844 Warsaw, Poland
   - 2.3. Management Board Member, Benefit Systems S.A., Plac Europejski 2, 00-844 Warsaw, Poland.
3. 3. In-person submissions – reports may also be submitted by arranging a meeting with designated members of the Ethics Committee.

All reports are treated with strict confidentiality. The procedure explicitly prohibits any retaliatory measures against whistleblowers, including intimidation or threats. Whistleblower protection is granted provided that:

- the reporting person had reasonable grounds to believe that the information disclosed was true at the time of reporting,
- the report concerns violations of law within the scope defined in the Whistleblower Protection Act.

Other procedures for reporting breaches

Since 2017, the Parent has additionally operated the Procedure for Anonymous Reporting of Suspected Violations of Law, Internal Regulations and Ethical Standards, as updated in 2024.

Reporting channels for internal stakeholders includes:

- Anonymous reporting platform – an external system that allows reports to be submitted anonymously in electronic form, either in writing or verbally, via a dedicated online platform: benefitsystems2.whistlelink.com,
- Written submissions – anonymous reports may be sent by post to the designated correspondence address, marked "Confidential".

In addition to internal stakeholders, the Benefit Systems Group enables its partners, customers, suppliers, and other external stakeholders to report suspected breaches. External parties may report violations of applicable laws, ethical standards, or internal regulations in connection with the Group's activities, including, among other things:

- unethical business practices,
- corruption,
- breaches of environmental protection standards,
- other actions violating human rights or infringing upon the interests of end-users.

The designated point of contact for external stakeholders is the Compliance Officer at Benefit Systems S.A.

The implemented procedures are designed to facilitate the identification, reporting, and investigation of violations. A key element of this system is the promotion of employee awareness through regular ethics-focused training. Whistleblower reports and internal anonymous submissions are received by the Ethics Committee, which ensures impartiality, independence, and the protection of the reporting person's identity. All submissions are reviewed with strict confidentiality and objectivity. Information related to reports is periodically communicated to the Management Board and the Audit Committee, with due regard to the need to maintain its confidentiality.

G1-2

Management of relationships with suppliers

Among its suppliers, within the meaning of the European Sustainability Reporting Standards (ESRS), the Group identifies two distinct categories, each governed by different principles of business cooperation.

The first category includes partners that provide products and services for customers and end-users. This group comprises:

- owners and managers of sports facilities accessible through the MultiSport card,
- partners delivering a wide range of benefits under the MyBenefit cafeteria programme across sectors such as tourism, retail, food services, culture, recreation, and sports,
- partners supporting the MultiLife programme, including dieticians, financial advisors, and language instructors. The offering also includes services related to physical health (preventive medical screenings, doctors, fitness trainers) and mental health.

The second category consists of suppliers of utilities (natural resources), materials, products (including sports facility equipment), and upstream services that are essential for day-to-day operations of the business.

Each of these groups is subject to tailored cooperation principles reflecting the specific nature of their role in the Group's operations and how they contribute to the achievement of its strategic objectives.

Criteria for selecting suppliers and partners

In selecting suppliers, Benefit Systems S.A. applies the following criteria and rules:

- Respect for the principle of a level playing field: the supplier selection process follows the good practice of ensuring equal opportunities in competing for contracts,
- Strengthening collaboration: the Company fosters effective cooperation and long-term relationships with existing suppliers, while maintaining the flexibility to engage new suppliers in line with its evolving needs,
- Focus on support for smaller, local enterprises: in line with the B Corporation Movement standards, the Parent prioritises the selection of product and service suppliers that are small, local enterprises and family-run businesses, thereby supporting local communities,
- Objective evaluation: supplier selection includes an impartial assessment of price and quality, accompanied by a review of the ethical standards upheld by the supplier,
- Mutual fairness and win–win collaboration: for Benefit Systems S.A. it is important to ensure that both the customer and supplier are satisfied with the terms of business, fostering relationships built on mutual fairness.

The Code of Ethics affirms the Group's commitment to the principles of honesty, integrity, and ethical conduct – and the Group expects the same standards of behaviour from its partners and suppliers. The Group exercises due diligence in the negotiation and execution of contracts. However, as of now, a uniform, formalised approach applicable across all Group companies, one that would systematically address supplier and partner relationships with regard to supply chain risks and sustainability impacts, has not yet been implemented. In the opinion of the Parent Benefit Systems S.A., the current quality of relationships with suppliers and partners meets the expectations of both sides. At the same time, the Company plans to develop and adopt dedicated supplier standards in the coming years.

The Parent Benefit Systems S.A. incorporates environmental and social criteria into supplier evaluations through a dedicated CSR Questionnaire, which constitutes an integral part of the Procurement Procedure. The questionnaire includes questions related to business ethics, anti-corruption measures, human rights, labour rights, as well as occupational health and safety. The ESG Department's evaluation of the supplier, based on the responses provided, carries a consistent weight in supplier selection decisions.

For partners who are not assessed via the CSR Questionnaire, the standard Business Ethics Principles schedule is included in contracts, outlining the ethical standards upheld by the Benefit Systems Group and articulating the Group's expectation that its partners conduct business in alignment with these principles.

The Business Ethics Principles reference the following policies and procedures:

- Benefit Systems Group Code of Ethics – BS_WAY,
- Anti-Corruption Policy,
- Gifts and Hospitality Procedure, and Conflicts of Interest Procedure.

Furthermore, since 2022, the procurement process has included screening of potential trade partners against sanctions lists.

Policies to prevent late payments

At the Parent level, payment terms are governed by the Procurement Procedure. In 2024, the Benefit Systems Group did not have in place a uniform, formal procedure to prevent late payments, particularly to small and medium-sized enterprises. Nonetheless, the established practice across Group companies is to settle payments within contractually agreed timelines. Adherence to timely payments is considered a key element of fostering long-term, stable business relationships.

Publication approval and attestation

The Benefit Systems Group Sustainability Report 2024, which is part of the Consolidated Management Report on the Operations of the Benefit Systems Group for the period from January 1, 2024 to December 31, 2024, was approved for publication by the parent company's Board of Directors on April 7, 2025.

The report was subject to an attestation service by a key auditor acting on behalf of an audit firm - KPMG Audyt Limited Liability Company sp.k.- providing limited assurance as to whether it was prepared in accordance with applicable laws and regulations:

- with respect to compliance with sustainability reporting standards within the meaning of Article 63p(2) of the Accounting Act of September 29, 1994, that is, the European Sustainability Reporting Standards adopted by Commission Delegated Regulation (EU) 2023/2772 of July 31, 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting standards ("ESRS");
- on compliance with the ESRS of the materiality assessment process carried out by the Group to identify information included in Sustainability Reporting
- on the compliance of Sustainability Reporting with the reporting requirements of Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on establishing a framework to facilitate sustainable investment, amending Regulation (EU) 2019/2088 (the "Taxonomy Regulation").

The Sustainability Report of the Benefit Systems Capital Group, together with the independent auditor's assurance report for the year 2024 on sustainability reporting providing limited assurance, has been published in the Electronic Information Transmission System (ESPI) of the Polish Financial Supervision Authority: https://espiebi.pap.pl/node/685426

Benefit Systems