



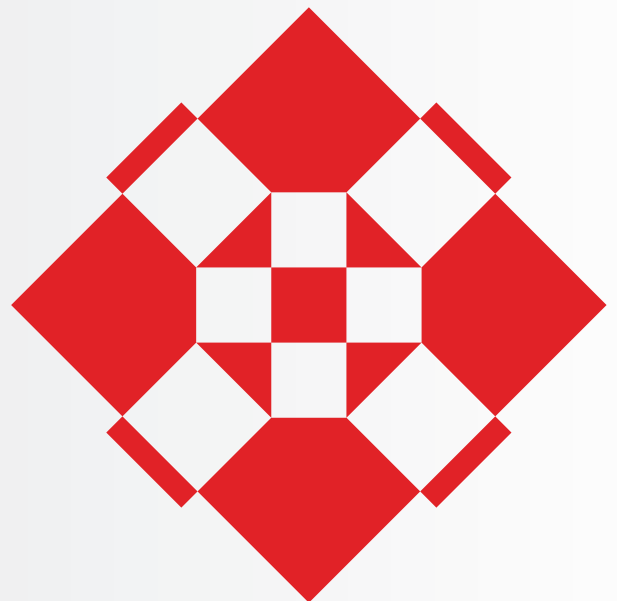
ten square_games

2024

**SUSTAINABILITY
STATEMENT**

of the Ten Square Games S.A. Capital Group
and Ten Square Games S.A.
for 2024

This English language translation has been prepared solely for the convenience of English speaking readers. Despite all the efforts devoted to this translation discrepancies, omissions or approximations may exist. In case of any differences between the Polish and the English versions, the Polish version shall prevail. Ten Square Games S.A., its representatives and employees decline all responsibility in this regard.



Wrocław, March 24, 2025

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ESRS 2

GENERAL DISCLOSURES

BP-1

General Basis for the Preparation of Sustainability Statements

The Ten Square Games Group is not subject to the reporting obligation introduced under the implementation of the Corporate Sustainability Reporting Directive (CSRD) for the financial year starting on January 1, 2024, and ending on December 31, 2024. However, the Group has voluntarily decided to prepare this report.

This 2024 report has been prepared in a consolidated version, with the scope of consolidation identical to that of the Financial Statement for the same period.

Due to its voluntary nature, this report has not been audited by an external auditor.

For the purposes of this report, the terms "TSG" and "Group" refer to the parent company, Ten Square Games S.A., together with its subsidiaries: Play Cool Zombie Sport Games Sp. z o.o., Ten Square Games Germany GmbH, and Rortos S.R.L.

The disclosures in this report consider information related to the Group's own operations. Relationships with consumers and end users are described in ESRS S4 disclosures. Information regarding the value chain includes greenhouse gas emissions calculations.

This report does not apply exemptions related to the publication of highly protected and confidential information regarding know-how or innovation outcomes. Additionally, no information on expected developments or events resulting from ongoing negotiations has been omitted.

BP-2

Disclosure of Information in Relation to Specific Circumstances

The Group has defined time horizons based on a peer group analysis as follows:

- » Short-term: 2024–2025
- » Medium-term: 2026–2030
- » Long-term: 2031–2050

For the purpose of preparing this report, the Group has estimated selected indicators related to the value chain for greenhouse gas emissions calculations. These indicators are described in the environmental section of the report – ESRS E1.

This report is the first that the Group has prepared in accordance with the CSRD directive guidelines. It does not disclose information based on other regulations or generally accepted interpretations and standards related to sustainability reporting.

Some information in the report has been disclosed by reference, in accordance with ESRS 1, Section 9.1 Inclusion by Reference. However, the Company has not included a reference table in the report

GOV-1

Role of Administrative, Management, and Supervisory Bodies

Supervisory Board

As of December 31, 2024, the Supervisory Board of the Ten Square Games Capital Group consisted of six members, including one woman (women representing 17% and men 83% of the Board).

The members of the Supervisory Board were as follows:

- » Rafał Olesiński – The Chairman of the Supervisory Board
- » Marcin Bitos
- » Wiktor Schmidt
- » Arkadiusz Pernal
- » Maciej Marszałek
- » Kinga Stanisławska.

	Women	Men
No. of people:	1	5
Percentage of each gender in the Supervisory Board structure	17%	83%

Between January 1, 2024, and December 31, 2024, there were no changes in the composition of the Supervisory Board. The same members were re-elected in May 2024 for the next term.

Four out of six members of the Supervisory Board meet the independence criteria specified by the Act on Statutory Auditors, Audit Firms, and Public Oversight of May 11, 2017.

Within the Supervisory Board of Ten Square Games S.A., two committees operate:

- » Audit Committee
- » Nomination and Remuneration Committee

The Audit Committee serves an advisory and consultative role, primarily overseeing the selection process of entities conducting the audit of the Company's standalone financial statements and the consolidated financial statements of the Company's capital group, as well as ensuring their independence. Additionally, the committee facilitates communication between these entities and the Company.

The Committee may express non-binding opinions on all matters concerning the Company and submit proposals and initiatives to the Supervisory Board and the Management Board.

The key responsibilities of the Audit Committee include:

- (i) monitoring the financial reporting process;
- (ii) monitoring the effectiveness of internal control systems, risk management systems, and internal audit processes, including those related to financial reporting;
- (iii) monitoring the performance of statutory audits;
- (iv) informing the Supervisory Board about the audit results and explaining how the audit contributed to the reliability of the Company's financial reporting, as well as the role of the Audit Committee in the audit process.

The Nomination and Remuneration Committee serves an advisory and consultative role for the Supervisory Board and the Company in matters related to the employment and remuneration of Management Board members. The Committee may express non-binding opinions on all matters concerning the Company and submit proposals and initiatives to the Supervisory Board and the Management Board, including those related to the employment and remuneration of key managers within the Company.

The key responsibilities of the Nomination and Remuneration Committee include:

- (i) assessing candidates for Management Board positions, reviewing motions for the dismissal of Management Board members, and providing opinions to the Supervisory Board on these matters;
- (ii) determining and recommending candidates for appointment to the Management Board by the Supervisory Board, considering the necessary knowledge, skills, and experience required to manage the Company effectively;
- (iii) evaluating the structure, size, composition, and effectiveness of the Management Board and recommending any necessary changes to the Supervisory Board;
- (iv) determining the form and amount of remuneration for Management Board members, including incentive plans.

Management Board

As of December 31, 2024, the Management Board of the parent company of the Ten Square Games Capital Group consisted of three members:

- » Andrzej Ilczuk – President of the Management Board, COO
- » Janusz Dziemidowicz – Member of the Management Board, CTO
- » Magdalena Jurewicz – Member of the Management Board, CFO

	Women	Men
No. of people:	1	2
Percentage of each gender in the Management Board structure	33%	67%

Throughout 2024, there were no changes in the composition of the Management Board. The same members were reappointed for a new term in May 2024. In the past year, no employee representatives served on the Management Board of Ten Square Games.

The double materiality assessment conducted by the Ten Square Games Group identified significant impacts, risks, or opportunities in the areas listed in the table below. These topics have been appropriately mapped to the thematic scope of the Ten Square Games ESG Strategy, which defines the oversight of specific ESG-related topics by designated members of the Management Board.



ESG TOPIC	ESG STRATEGY OBJECTIVE
Climate change	We will reduce Scope 1 and Scope 2 emissions
	We will reduce Scope 3 emissions
	We are raising climate awareness at Ten Square Games
	We will engage players in climate action
Own workforce	We will build an inclusive and friendly work environment
	We will eliminate pay inequalities
	We will support the development of our employees
Consumers and end users	We will foster good relationships with players and among players
Business governance	We will implement a comprehensive ESG due diligence process
	We will ensure an adequate level of ESG risk management
	We will provide support for the implementation of ESG initiatives

The responsibility for achieving specific goals aligns with the division of duties among the Management Board members.

The Company's governance structure ensures effective oversight of sustainability-related matters. The diverse expertise of the Supervisory Board members, covering areas such as law, technology, finance, business operations, and investments, enables a comprehensive assessment of the Company's impact on its environment and effective management of ESG-related risks and opportunities.

The Supervisory Board leverages its competencies to ensure that the strategy of Ten Square Games S.A. integrates sustainability considerations as an essential part of the Company's operations. This includes overseeing compliance with legal regulations as well as evaluating the materiality of ESG issues, their impact on the Company's long-term value, and their significance for stakeholders.



Key Areas of Knowledge and Skills for ESG Oversight

- » **Law and Regulatory Compliance** – The Chairman of the Supervisory Board possesses legal expertise, enabling oversight of the Company's compliance with ESG regulations and reporting requirements.
- » **Sustainability and Technology** – Supervisory Board members have experience in implementing ESG strategies in technology companies, with notable expertise in obtaining B Corp certification. This certification requires meeting high standards of corporate social and environmental responsibility and ensuring the company's long-term impact on its surroundings. These competencies facilitate the identification of best practices for integrating ESG into business operations and their effective implementation within the Company.
- » **Integration of ESG into the Business Model** – The presence of a Company co-founder on the Board provides a strategic perspective, allowing for the assessment of how ESG initiatives align with the Company's long-term development.
- » **Financial Analysis and Materiality Assessment** – Board members have experience in finance, enabling a proper evaluation of the materiality of ESG factors in relation to the Company's financial performance and long-term growth potential.
- » **Social Aspects of ESG** – The Board has expertise in capital investments and diversity initiatives, supporting the development of equal opportunity strategies and the Company's social engagement efforts.
- » **Digital Business Management and Value Chain** – The knowledge and experience of Board members in e-commerce, marketing, and digital sales contribute to the Company's responsible management of its impact on users and business partners.

Responsibility for managing sustainability-related impacts, risks, and opportunities is aligned with the division of competencies within the Management Board. The coordination of activities in this area is overseen by the ESG Team, which was established by Ten Square Games in November 2024.

The Company's ESG initiatives are coordinated by the Director of IR, PR & ESG. The ESG Team, consisting of a Management Board member and representatives from the Legal, HR, IR, PR & ESG departments, is responsible for monitoring the overall ESG activities. This structure ensures a comprehensive approach to managing key environmental, social, and governance (ESG) issues across the TSG Group. The individual responsible for coordinating ESG activities within the Company has experience in implementing, monitoring, and reporting ESG initiatives, supported by relevant educational background. In 2024, all members of the ESG Team participated in ESG-related training. Depending on the needs and the nature of specific topics, ESG Team members invite additional specialists to provide expert support where necessary.

The ESG Team works closely with the Management Board members to effectively manage sustainability-related impacts, risks, and opportunities. The frequency of ESG Team meetings varies depending on the needs associated with achieving specific goals. During these meetings, discussions include progress on the implementation of the sustainability strategy and ongoing ESG-related initiatives at Ten Square Games. The ESG Team includes Magdalena Jurewicz, a Management Board Member of Ten Square Games S.A. Her direct participation in the meetings ensures that all sustainability-related matters are effectively communicated to the Company's Management Board.

In 2024, ESG Team meetings focused on developing the TSG Group ESG Strategy, covering all significant sustainability-related risks, impacts, and opportunities. Additionally, meetings addressed key ongoing ESG matters, including ESG risk management actions, updates to internal regulations related to sustainability, and employee training programs in this area.

The action plan for the given year, progress in implementing previously established initiatives, and resources allocated for sustainability activities are presented to the Supervisory Board in the form of a document and discussed with them. The Supervisory Board also receives a report on the outcomes of sustainability initiatives carried out during the year and discusses the Company's sustainability efforts with the Management Board.

In 2024, representatives of the Company's Management Board participated in key workshops and meetings related to the Ten Square Games Group's sustainability initiatives. The ESG Team coordinated efforts to align the Group's annual action plan with the individuals responsible for various sustainability initiatives. The ESG Team representatives discussed and approved the ESG action plan, objectives, and the necessary budget for the past year with the Management Board. After discussions with the Management Board and the finalization of the ESG action plan, it is submitted for review by the Supervisory Board. The Supervisory Board receives updates on the progress of ESG initiatives at least once a year, unless it requests more frequent updates on this matter.

In 2024, the Management Board of Ten Square Games participated in workshops dedicated to developing the TSG Group Strategy and formally adopted it by resolution. Prior to this, the Management Board was also involved in the double materiality assessment and approved its findings through a resolution. Following consultations with the Audit Committee, the Company integrated ESG risks into the TSG Group risk matrix.

In 2024, the Company's Supervisory Board received information on sustainability matters, including sustainability reporting. Additionally, the Management Board provided updates on the progress of the TSG Group ESG Strategy and related internal regulations during the Supervisory Board's quarterly meetings.

The Company has not established an internal auditor as a separate organizational unit. In the event of identifying significant risks, the Company utilizes external experts, commissioning independent audits of selected areas of its operations. Internal control systems, risk management, and compliance with legal regulations (compliance) are managed within the existing management structure and through the activities of the finance and legal teams. Sustainability activities are continuously monitored by the ESG Team.



GOV-2

Information provided to the Administrative, Management, and Supervisory Bodies of the Entity and sustainability-related issues addressed by them

Impacts, risks, and opportunities

The Management Board, in its entirety, participated in the validation process of the double materiality assessment, which identifies the significant impacts, risks, and opportunities of the Capital Group in ESG-related matters.

Additionally, during the analysis of TSG Group's operational risks, the Management Board also assesses ESG risks, working in collaboration with the ESG Team, as well as representatives from the finance and legal teams. The Management Board shares the findings of this analysis with the ESG Team and the Supervisory Board.

Both the Management Board and the Supervisory Board took into account the significant impacts, risks, and opportunities when formulating the ESG Strategy goals.

The Management Board of Ten Square Games was actively involved in all stages of developing the TSG Group ESG Strategy. Throughout this process, the Board defined priorities for managing key risks, opportunities, and impacts identified as material in the double materiality assessment, as outlined in this report.

Due diligence process:

The TSG Legal Department ensures compliance with the Group's due diligence processes. The ESG Team, in close collaboration with the TSG Legal Department, periodically reviews compliance with due diligence processes, particularly following significant regulatory changes. The Management Board is informed of the need to implement changes to the due diligence process whenever legal regulations are updated. At least once a year, the Management Board provides the Supervisory Board with an update on the due diligence processes in place within the Group, including any changes made since the last report.

Policies, actions, and metrics:

The TSG Management Board formally approves all policies in the Company through resolutions and recommends their adoption in Group subsidiaries. The Board is regularly informed by the ESG Team about the implementation of these policies within the Company and the Group, as well as their role in supporting the due diligence process. In the second half of 2024, a set of policies was adopted, which are detailed in the later sections of this report. Training sessions were conducted within the Company to ensure employees are familiar with these policies. Key indicators in this area will be monitored in the future.

GOV-3

Incorporating sustainability performance into incentive systems

Sustainability performance is not included in the incentive systems for the governing bodies of the TSG Group.

GOV-4

Due diligence statement

KEY ELEMENTS OF THE DUE DILIGENCE PROCESS	KEY POINTS IN THE SUSTAINABILITY STATEMENT
Integration of due diligence into governance, strategy, and business model	G1-1 , S1-1, S4-1
Collaboration with stakeholders affected by the entity at all key stages of the due diligence process	SBM-2, S1-2, S4-2
Identification and assessment of adverse impact	SBM-3
Taking actions to mitigate identified adverse impact	S4-3, S1-3
Monitoring the effectiveness of these efforts and communicating relevant information	S4-4

GOV-5

Risk management and internal controls over sustainability reporting

In 2024, due to the absence of a sustainability reporting obligation for the Capital Group and the parent company, Ten Square Games, the Company has not yet implemented detailed internal control processes over disclosures within this report.

During the work of the ESG Team, it was established that sustainability reporting is the responsibility of the Director of IR, PR & ESG, in collaboration with other ESG Team members. Their responsibilities include:

- » coordinating activities related to data collection from various business areas,
- » providing information on the Company's sustainability initiatives,
- » verifying the completeness and integrity of data supplied by different departments within the Group.

The sustainability reporting process has been designed to ensure transparency and reliability. At this stage, it includes the following steps:

- » defining the content of the report,
- » collecting data,
- » verifying data in collaboration with the financial controller,
- » developing the final sustainability report content,
- » approval of the report by the Management Board.

The sustainability reporting process involves collaboration with various organizational units within the TSG Group. All participants in the process had the opportunity to familiarize themselves with the new reporting requirements under the European Sustainability Reporting Standards (ESRS) as part of the Double Materiality Analysis (DMA) process.

The identification and management of risks related to sustainability reporting are integral to responsible management. The TSG Group identifies and assesses risks that may impact the completeness, reliability, and compliance of sustainability reporting with applicable regulations. Currently, the Company is not subject to mandatory reporting under the CSRD Directive. However, following the European Commission's announcement in February 2025 regarding a package of sustainability reporting simplifications known as "Omnibus", the reporting deadline for the TSG Group will likely be postponed by at least two years.

The main risks identified in this area within the TSG Group include:

- » Regulatory risk – non-compliance with legal requirements and regulations;
- » Risk of data completeness and integrity – ensuring accurate and consistent data collection;
- » Risk of estimation accuracy – stemming from methodologies or assumptions used in calculations;
- » Limited availability or lack of data – from suppliers and other partners in the value chain.

To effectively manage these risks, the TSG Group has decided to prepare a Sustainability Report ahead of the regulatory requirement. This proactive approach allows the Group to test mitigation strategies in practice and develop internal solutions that will help minimize these risks in the future.



SBM-1

Strategy, business model and value chain

The Ten Square Games Group is a leading developer of innovative hobby-themed mobile games that accompany players for many years. The Group's business model is based on offering free-to-download games, monetized through in-app purchases made by players. A key element of the monetization strategy is Live Ops—regular in-game events that engage players through new challenges and objectives. Ten Square Games' business model, focused on the continuous development of its existing game portfolio, allows the company to generate consistent cash flow and improve financial performance without the need for significant investments in new game development. The games created by Ten Square Games are intended for adult users aged 18 and above.

The largest products in the Group's portfolio are Fishing Clash and Hunting Clash, whose continuous development and popularity among players provide financial stability for Ten Square Games. Both titles hold strong positions within their respective market segments. Ten Square Games aspires to strengthen the market position of its youngest title, Wings of Heroes, in the flight simulation segment. The company places great emphasis on the ongoing development of its key products by implementing innovative features and the latest technological advancements. All decisions regarding game development and updates are based on in-depth data analysis, multi-stage testing, and player feedback. This process is supported by technological systems developed by the Group's R&D team.

Among the players of the Group's flagship projects – Fishing Clash and Hunting Clash – men dominate, accounting for 84% and 83% of the player base, respectively. In both games, the largest age group consists of players aged 35-54, making up approximately 68% of the total player base. Players aged 18-34 represent around 10-11%, while the 55+ age group accounts for approximately 21% of players.

The majority of Fishing Clash and Hunting Clash players are individuals with a stable family life and professional careers. Their main motivations for playing include overcoming challenges, earning the highest scores, and spending time with like-minded individuals while competing against them. Most players list fishing and hunting as their real-life hobbies, indicating a strong connection between their personal interests and game preferences.

Based on a voluntary survey conducted among Wings of Heroes players, it was found that fans of this title are mature individuals, with an average player age of approximately 49 years. The player base is predominantly male, accounting for around 98% of total players.

They share common interests, including history, aviation, and outdoor activities. Players of Wings of Heroes are keen on expanding their knowledge of aviation and history and actively engage with realistic flight simulators.

Information regarding the largest revenue-generating markets for the Group can be found in the Consolidated Financial Statement of the TSG Group for 2024, under the additional notes and explanations – Note 1.6: Revenue – Geographic breakdown.

The structure of the Capital Group is detailed in the Financial Statement of Ten Square Games S.A., under Note 7.

The shareholding structure of Ten Square Games S.A. is detailed in the TSG Group Financial Statement for 2024, under Note 6.

Business Strategy Goals Related to ESG

Ten Square Games is a developer of hobby-themed mobile games, with its main products available in external mobile app stores across major markets. The Company's ambition is to be a leader in the market segments where its games are available. To achieve this, TSG actively acquires users worldwide, encourages engagement with its products, and strives to ensure long-term player retention. The business model of Ten Square Games S.A. is based on the ability to reach the right audience and create an engaging online entertainment space that players will want to return to regularly. Understanding and meeting the needs of the end user are at the core of Ten Square Games S.A.'s operations.

To support this mission, Ten Square Games regularly integrates climate change mitigation initiatives into its in-game events. The Company designs events that educate players on climate change, support organizations working on environmental initiatives, and encourage players to take tangible actions for the climate and planet in their own communities. Through these initiatives, TSG not only raises awareness about climate issues but also actively empowers players to engage in local sustainability efforts. Eco-themed events are a permanent feature in the event calendars of the Company's flagship games. This approach is an integral part of TSG's business strategy and is highly appreciated by players.

The mobile gaming market is rapidly evolving, and the Company's business offering must adapt to the diverse needs of players. For this reason, TSG places a strong focus on its team, ensuring a work environment that fosters creativity and providing training opportunities that support skill development. Initiatives in this area contribute to the execution of the Group's business strategy. To meet the changing expectations of players, TSG regularly consults with player groups on planned updates and changes to its games. Player feedback directly influences the development of in-game events and new features, ensuring that content aligns with player preferences. This approach directly supports the Company's business objectives.

Ten Square Games prioritizes player safety by implementing procedures that protect personal data and eliminate hate speech, discrimination, and other inappropriate behaviors from its games. To support this, the Company has developed a "Code of Conduct" for players, which includes guidelines for safe online behavior, examples of unacceptable conduct, and methods for reporting violations. These measures enhance player comfort and security, reinforcing Ten Square Games' business objectives.

A key challenge for Ten Square Games moving forward will be the development of CO₂ reduction targets, particularly in Scope 3 emissions. This initiative could, in the long term, impact the way the Company develops and maintains its games.

Below, Ten Square Games presents its sustainability goals along with their implementation timeline.

ESRS THEMATIC AREA	GOAL IN LINE WITH THE STRATEGY	2025	2030	2050
E1	Reduction of Scope 1 and Scope 2 emissions.	By the end of 2025, we will establish reduction targets for Scope 1 and Scope 2 GHG emissions.	We will validate our targets with the Science-Based Targets Initiative (SBTi).	We will strive to achieve neutrality in Scope 1 and Scope 2 emissions.
E1	Reduction of Scope 3 emissions.	We will calculate and set targets for significant categories of Scope 3 GHG emissions.	We will validate our targets with the Science-Based Targets Initiative (SBTi).	We will take actions to reduce emissions in significant categories.
E1	Raising Climate Awareness at Ten Square Games.	We will organize or participate in initiatives that raise climate awareness among Ten Square Games employees.	Continuing to organize and participate in initiatives that raise climate awareness among Ten Square Games employees.	Ongoing organization and engagement in initiatives that raise climate awareness among Ten Square Games employees.
E1	Engaging players in climate action	Providing players with opportunities to participate in our climate action initiatives through in-game events.	Maintaining the practice established in the short-term horizon.	Sustaining the practice implemented in the short-term horizon.
S1	Building an inclusive and supportive work environment.	Developing supportive policies and processes. Joining the Diversity Charter and Women in Gaming initiatives.		
S1	Eliminating pay inequalities	We will calculate the adjusted gender pay gap at Ten Square Games.	We will implement actions to minimize the adjusted gender pay gap.	We will strive to reduce the pay inequality index to 0%.
S1	Fostering the development of our employees	We will assess the training needs of our employees, update the development path for key employee groups, and implement training monitoring within the Group.	Continuation of actions planned in the short-term horizon, creation of comprehensive development path maps.	Continuation of actions planned in the short – and mid-term horizon, creation of comprehensive development path maps.
S4	Fostering positive relationships with and among players	We will assess players' needs regarding comfort and relationships, both among players and between Ten Square Games and its players.		
G1	Implementation of a comprehensive ESG due diligence process.	We will develop policies that support ethical conduct within the Ten Square Games Group. We will establish effective communication methods on ethical behavior, including training modules.		
G1	Ensuring an adequate approach to risk management.	We will introduce necessary modifications to risk maps and actively assess risks and opportunities related to sustainable development.		
G1	Ensuring support for the implementation of ESG initiatives.	We will establish an internal team to support sustainable development initiatives.		

In cases where game changes do not receive user acceptance, the Company is compelled to revise its actions and make adjustments to the product. In this context, the impact of the end user on the product development strategy should be considered significant.

The Company strongly condemns all forms of discrimination and relies on automated chat filters to identify vulgar, offensive, or discriminatory language. In cases of verbal aggression, the Company has the ability to block access to the game for players who engage in inappropriate behavior. In exceptional cases, the Company encourages any player who feels targeted by aggression to cooperate with law enforcement authorities.

The products created by the Group are virtual goods. Information on how to use the games is available on the Ten Square Games website as well as directly within the game application.

If players have any doubts regarding game usage, they have access to the terms of service, in-game virtual guides, and can contact the customer support center, which responds within a maximum of 48 hours.

Ten Square Games does not operate in sectors related to fossil fuels, chemical production, controversial weapon manufacturing, or the cultivation and production of tobacco.

Assessment of current products or services and key markets and customer groups in relation to sustainability goals

Ten Square Games leverages its products, such as Fishing Clash and Hunting Clash, not only to provide entertainment to millions of players worldwide but also as a platform for raising environmental and social awareness. Through initiatives like the Green Game Jam and Make Green Tuesday Moves, the company actively engages players in environmental protection efforts, promoting themes related to the restoration of aquatic ecosystems and sustainable fishing. These initiatives not only enhance player engagement but also strengthen the company's reputation as a responsible entity within the gaming industry.

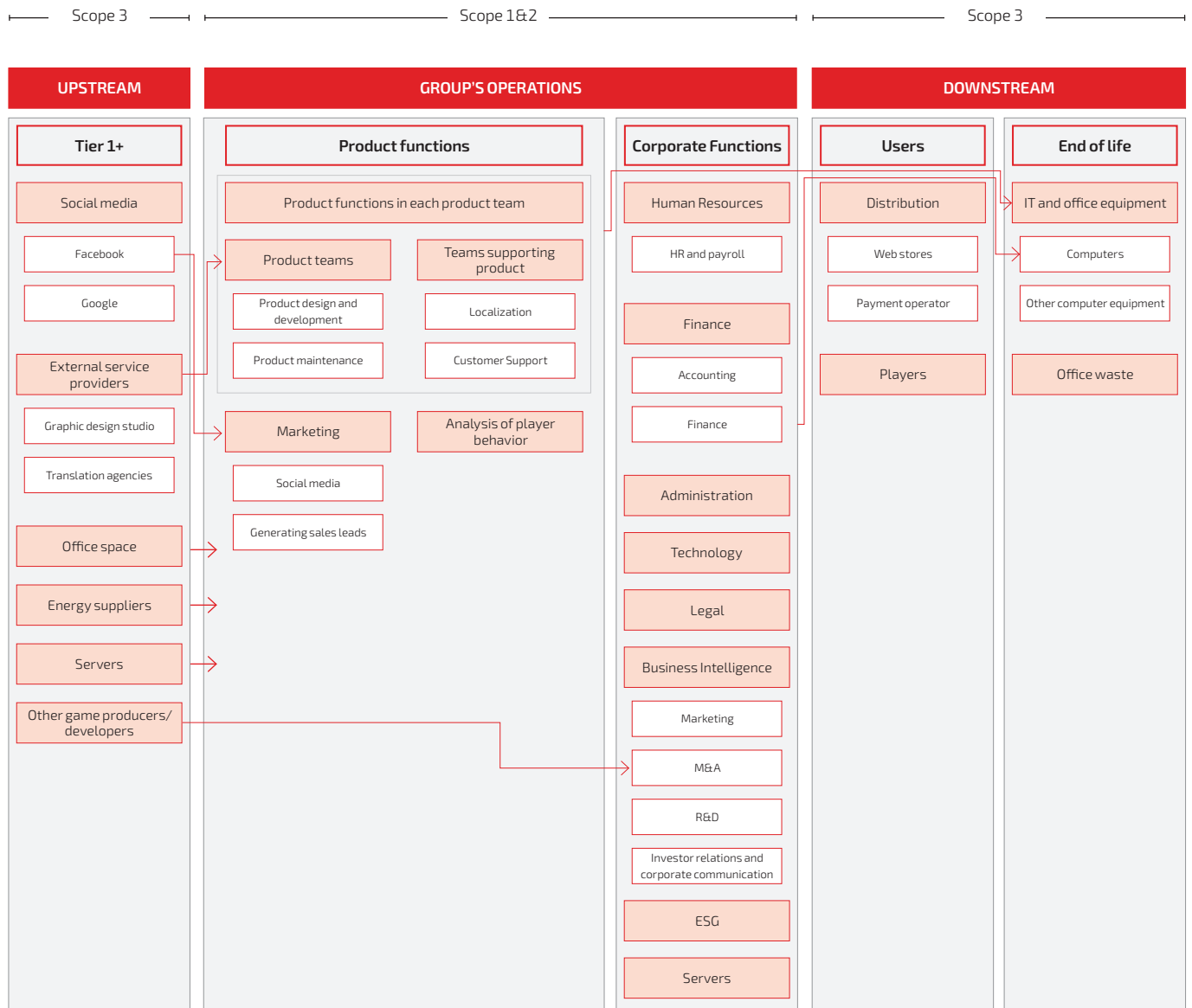
The key markets for the company's products are the USA and Europe, where the diversity of players allows for the implementation of solutions that reflect varied needs and values. Efforts toward diversity and inclusion, both within the products and the organization, support Ten Square Games' ESG strategy. Diverse teams within the company enhance the ability to effectively respond to customer needs, fostering innovation, product development, and strengthening adaptability in dynamically evolving markets.

The introduction of the Code of Conduct for players promotes responsible and ethical gameplay, ensuring a positive environment for the gaming community. In 2024, the company conducted a survey to assess players' awareness of this document. These efforts help build customer loyalty and trust.

Through such initiatives, the company's products support sustainability goals such as climate change mitigation, responsible consumption, environmental education, and the promotion of equality. At the same time, these actions align with Ten Square Games' business objectives by strengthening its brand reputation, increasing player engagement, improving customer retention, and creating a competitive advantage in key markets.



Value chain of TSG Group



SBM-2

Interests and opinions of stakeholders

The company identified the main stakeholder groups through a two-stage process using the following research tools:

- » questionnaire survey conducted among representatives of all key management areas within the company,
- » questionnaire survey conducted with subject matter experts within the company,
- » questionnaire survey and structured interviews with five representatives of the company's external stakeholders.

For each stakeholder, the bidirectional influence was assessed: The company's influence on the stakeholder, The stakeholder's influence on the company. The strength of influence was evaluated on a six-point scale: 6 – Very strong, 5 – Strong, 4 – Above average, 3 – Below average, 2 – Minimal, 1 – No influence.

The five identified stakeholder groups are:

- » consumers,
- » employees,
- » suppliers,
- » legislative bodies and public administration,
- » investors and potential investors.

The company engages in dialogue with all stakeholder groups, focusing on: informing stakeholders about Ten Square Games S.A.'s current operations; monitoring stakeholder opinions to effectively address emerging needs and expectations.

The company has provided dedicated email contact points on its website, allowing stakeholders to reach out regarding: partnerships and media inquiries, technical support, reporting violations of laws and internal regulations at Ten Square Games S.A.

A description of the scope and intensity of Ten Square Games S.A.'s engagement with these key stakeholder groups is presented below.

Consumers – Players

The company maintains both proactive and reactive communication with its consumers—players. This communication occurs directly through organized online meetings and indirectly via media channels and social media platforms. Additionally, the company conducts numerous discussions and tests involving players to gather feedback on ideas for further developing its projects. Insights from these interactions are continuously relayed to the teams responsible for product development strategies to ensure the best alignment with players' needs and maximize the chances of business success for each project.

In pursuit of best practices for fostering a player-friendly environment, Ten Square Games has joined Fair Play Alliance, a global coalition of game developers dedicated to promoting fair play principles and supporting positive interactions in online games.

In 2023, the company introduced the Code of Conduct, a set of rules and guidelines defining appropriate behavioral standards for all members of its gaming community. In 2024, Ten Square Games conducted a survey among players to assess awareness of this document. Nearly 44,000 players participated in the survey. Among them: 50% were aware of the Code of Conduct's existence. Over 70% of those aware had read the document. 24% of readers stated that they regularly refer to the Code. More than 50% of those familiar with the Code believed it is helpful in improving the gaming environment within the company's titles.

Employees

Employees are the greatest asset of the Group. Retaining the most talented individuals who can create games that engage millions of players is one of the Group's top priorities. The company maintains ongoing dialogue with employees through various communication channels, including meetings, mailings, surveys, opinion studies (Pulse Check), periodic reviews, and feedback sessions.

Ten Square Games has also implemented the WhistBoard platform, which allows employees to report potential irregularities through direct contact, an anonymous submission, or a confidential contact form.

Suppliers

The Ten Square Games Group collaborates with major global IT service providers. Communication with suppliers takes place through established business communication channels, including individual business meetings, online meetings, and email correspondence.

Ten Square Games enters into agreements based on fair cooperation principles, ensuring that they align with the internal policies of both parties.

Legislative bodies and public administration

The company timely fulfills its public-law obligations.

Since 2018, Ten Square Games' shares have been listed on the Warsaw Stock Exchange (GPW). The company complies with all disclosure requirements for publicly traded companies, including the publication of current and periodic reports.

In its relations with public administration, the company prioritizes transparency and ensures that required information is provided on time.

Investors and Potential Investors

Ten Square Games complies with all disclosure requirements for publicly traded companies, including the publication of current and periodic reports.

The company places the highest importance on transparency in its relations with the capital market. Detailed and clear information about key operational and corporate events is provided to stakeholders through reports, press releases, and updates on the company's website. This includes changes in strategy and future plans.

Ten Square Games actively engages in direct dialogue with investors through meetings, conferences, teleconferences, and by responding to inquiries from both individual and institutional investors. After each financial results publication, the company organizes market conferences and investor Q&A sessions. Additionally, Ten Square Games hosts an open day for capital market representatives, offering them a closer look at the company's operations.

Information about the company and its current activities is available in both Polish and English.

Ten Square Games participates annually in multiple international and domestic investor conferences and selected events for retail investors.

The company offers real-time remote voting during General Meetings of Shareholders, should shareholders express such a need.



SBM-3

Significant impacts, risks, and opportunities and their interconnections with strategy and business model

Materiality assessment: significant impacts

In the conducted materiality assessment, Ten Square Games identified areas where the Group exerts a significant impact.

ESRS topic	IMPACT CATEGORIZATION				IMPACT CHARACTERISTICS			
	Material topic (Sub-Sub-topic) / Dependencies	The name of the impact	Positive/negative impact	Potential/real	Time perspective	Which element of the value chain is the impact related to?	Does it result from the business model and/or business strategy?	Description of impact
E1	Climate change mitigation	Impact on emission reduction through organized actions in Ten Square Games' games.	Positive	Real	from short-term to long-term	Downstream	The impact stems from the business model	The Group has a positive impact on climate change through in-game events, the results of which translate into real-world climate action.
	Energy	Impact on green-house gas emissions.	Negative	Real	from short-term to long-term	Own operations	The impact stems from the business model	For operational purposes, Ten Square Games Group consumes electricity and fuels, and also purchases services and goods that are associated with emissions in Scope 3 according to the GHG Protocol methodology.
S1	Job security	Impact on job stability and security through the formulation of recruitment and offboarding practices.	Positive	Real	from short-term to long-term	Own operations	Business strategy	The Group has a positive impact on job security by adhering to market standards in employee recruitment, employment, and potential departure from the company. The Group provides job descriptions for various positions and conducts regular feedback processes.
	Working hours	Impact on the amount of tasks assigned to employees.	Positive / Negative	Real	from short-term to long-term	Own operations	Business strategy	The Group has a positive impact on employees' working hours by controlling the amount of tasks and hours worked within a given month. The Company monitors staffing needs in relation to the number of planned tasks and conducts necessary recruitment. The Group may have a negative impact on employees' working hours in situations involving unplanned tasks or temporary staff shortages.
	Adequate remuneration	The impact on employee remuneration through the formulation of a remuneration policy.	Positive	Real	from short-term to long-term	Own operations	Business strategy	The Group has a positive impact on fair employee compensation through the formulation of a remuneration policy. The Company has implemented a Remuneration Regulations and an Additional Benefits Regulations. The Company regularly conducts a market salary benchmark, monitors employee salaries (and makes necessary adjustments), and carries out official salary increase processes.
	Dialog with the employees	The impact on dialogue with employees is achieved through regular communication within the Group.	Positive	Real	from short-term to long-term	Own operations	Business strategy	The Group maintains regular dialogue with employees through cyclical meetings known as "couchtalks," where employees have the opportunity to ask any questions to the management and other company departments. Regular employee satisfaction surveys are conducted. Furthermore, the company continuously communicates all important events and informs employees about financial results. The company also holds regular elections and engages in dialogue with Employee Representatives.

IMPACT CATEGORIZATION				IMPACT CHARACTERISTICS				
ESRS topic	Material topic (Sub-Sub-topic) / Dependencies	The name of the impact	Positive/negative impact	Potential/real	Time perspective	Which element of the value chain is the impact related to?	Does it result from the business model and/or business strategy?	Description of impact
S1	Work-life balance	Impact on the number of tasks assigned to employees.	Positive / Negative	Real	from short-term to long-term	Own operations	Business strategy	The Group has a positive impact on ensuring work-life balance for employees by monitoring the number of tasks and hours worked within a given month. The company monitors staffing needs in relation to the number of planned tasks and conducts necessary recruitment. The company keeps track of unused employee vacation days and educates leaders about the importance of rest. The company offers benefits to its employees that can have a positive impact on their well-being. The Group may have a negative impact on employees' work time in situations involving unplanned tasks or temporary staff shortages. Employees have the opportunity to report any inconsistencies through the Whistleblower procedure.
	Occupational Health and Safety	The impact on occupational health and safety is achieved through the implementation of safety procedures and regular training.	Positive	Real	from short-term to long-term	Own operations	Business strategy	The Group exerts a positive impact by implementing safety procedures (e.g., fire safety procedures), conducting regular health and safety training for employees, and performing workplace safety audits. The company has conducted a workplace risk assessment and provides ergonomic workstations. Additionally, the company has a remote work policy and a resolution regarding the purchase of corrective glasses. The company ensures health prevention for employees through the offered benefits.
	Equal treatment and equal opportunities	Impact through the implementation of the Anti-Harassment, Anti-Discrimination, Anti-Molestation, and Other Undesirable Behavior Policy.	Positive	Real	from short-term to long-term	Own operations	Business strategy	The Group exerts a positive impact through the implementation of the Anti-Harassment, Anti-Discrimination, Anti-Molestation, and Other Undesirable Behavior Policy. The company conducts education for employees and candidates on diversity and equal treatment. Employees have the opportunity to report any inconsistencies through the Whistleblower procedure.
S1	Gender equality and equal pay for work of equal value.	The company exerts a positive impact through the formulation of a compensation policy and the implementation of a policy to prevent mobbing, discrimination, harassment, and other undesirable behaviors.	Positive	Real	from short-term to long-term	Own operations	Business strategy	The company exerts a positive impact on pay equality by formulating a compensation policy. The company conducts regular salary reviews for its employees at least twice a year and monitors the gender pay gap, implementing any necessary corrective actions. Furthermore, the company provides employee education on compensation policies. The company has implemented a policy to prevent mobbing, discrimination, harassment, and other undesirable behaviors and conducts training for employees and candidates in this regard. Employees have the opportunity to report any discrepancies through the Whistleblower procedure.
	Training and employee development.	The impact through the formulation of a training policy.	Positive	Real	from short-term to long-term	Own operations	Business strategy	The company has a positive impact by formulating a training policy, providing training and other development activities for all employees (both entire teams and individual employees). The company runs a development program for leaders and has career path descriptions for key positions within the company. The company monitors the expenses and hours dedicated to development and training. Employees have the opportunity to report any discrepancies through the Whistleblower procedure.

IMPACT CATEGORIZATION			IMPACT CHARACTERISTICS					
ESRS topic	Material topic (Sub-Sub-topic) / Dependencies	The name of the impact	Positive/negative impact	Potential/real	Time perspective	Which element of the value chain is the impact related to?	Does it result from the business model and/or business strategy?	Description of impact
	Employment and integration of people with disabilities	Impact through the formulation of the Policy for preventing bullying, discrimination, harassment, and other undesirable behaviors.	Positive	Potential, Real	from short-term to long-term	Own operations	Business strategy	The Group exerts a positive impact through the implementation of the Anti-Bullying, Anti-Discrimination, Anti-Harassment, and Anti-Unwanted Behavior Policy. The company educates employees and candidates regarding this policy.
	Prevention of violence and discrimination in the workplace.	Impact through the formulation of the Policy for preventing bullying, discrimination, harassment, and other undesirable behaviors.	Positive	Real	from short-term to long-term	Own operations	Business strategy	The Group exerts a positive impact through the implementation of the Anti-Harassment, Anti-Discrimination, and Anti-Bullying Policy, as well as addressing other undesirable behaviors. The company educates employees and candidates regarding this policy. Employees have the opportunity to report any discrepancies through the Whistleblower procedure.
S4	Diversity	Impact through the formulation of a Diversity Policy.	Positive	Real	from short-term to long-term	Own operations	Business strategy	The Group exerts a positive impact through the implementation of a Diversity Policy. Employees have the opportunity to report any discrepancies through the Whistleblower procedure.
	Right to privacy	Impact through ensuring personal data protection policy.	Positive	Potential	from short-term to long-term	Own operations		The Group complies with personal data protection regulations, formulates a personal data protection policy, and trains employees in this area. The Company limits employee monitoring to necessary areas and in accordance with the law.
	Privacy	Impact on security in personal data processing processes.	Positive, Negative	Potential	Long-term perspective	Downstream	The impact stems from the business model	Ten Square Games Group applies regulations that impose obligations regarding proper handling of personal data processing. Additionally, the company trains individuals who have access to personal data on its processing and procedures in case of violations of these rules. Anyone who observes a violation of the rules regarding personal data processing can report it through the violation reporting system. Adhering to the established process may have both potential positive and negative impacts in the foreseeable future.
S4	Freedom of speech	Impact on freedom of speech in games through the use of mechanisms that censor certain statements.	Positive, Negative	Potential	Long-term perspective	Downstream	The impact stems from the business model	Ten Square Games implements mechanisms in its games to monitor statements that are inconsistent with community guidelines, such as profanity, offensive, or discriminatory language. This action can positively impact the user experience by improving comfort and eliminating inappropriate language. On the other hand, it may be perceived by some users as a potential limitation on freedom of speech.
	Access to quality information.	Impact on building awareness of the community rules of Ten Square Games' games.	Positive	Real	Long-term perspective	Downstream	No	Ten Square Games Group has introduced a "Code of Conduct" that defines behavior patterns promoting a friendly environment in the Group's games and highlights behaviors that, according to the Group, are inappropriate, not in line with social coexistence principles or legal regulations. In 2024, the Company conducted a survey among players to assess their awareness of the document and plan actions aimed at popularizing behavior patterns consistent with the Code of Conduct. Increasing players' awareness of the document's existence, the principles described within it, and encouraging them to adhere to these principles will have a positive impact in the foreseeable future.

IMPACT CATEGORIZATION			IMPACT CHARACTERISTICS					
ESRS topic	Material topic (Sub-Sub-topic) / Dependencies	The name of the impact	Positive/negative impact	Potential/real	Time perspective	Which element of the value chain is the impact related to?	Does it result from the business model and/or business strategy?	Description of impact
G1	Access to products and services.	Impact on product accessibility through solutions implemented in games.	Positive, Negative	Potential	Long-term perspective	Downstream	Yes	Ten Square Games Group has not yet implemented any mechanisms in its games to allow visually impaired individuals to participate in gameplay. The only form of communication in the game is brief text messages in the chat features available in the game. As for sound, it does not play a significant role in the gameplay, which is why hearing impairments do not hinder enjoying the entertainment offered by the Group's games. The Group's products are available in over 90 countries worldwide, which are important from the business model perspective. The company withdraws its products from countries that are subject to sanctions imposed by international institutions, such as those related to an invasion of another country.
	Responsible marketing practices	Impact on conscious consumer decisions built through appropriate marketing practices in games.	Positive, Negative	Real	Short term perspective	Own operations	The impact stems from the business model	Marketing communication is a key tool for informing users about new features in the game (e.g., new events). Most of the Group's games are available in a free-to-play model, meaning the company does not charge players for downloading the game. The main source of revenue for the Group comes from in-game payments made by players to purchase items that allow them to progress faster in the game. Marketing communication activities aim to inform players about the latest events in the game and encourage their participation. Marketing communication positively influences the increase in the number of players and their behaviors, but it can be perceived negatively by some players as an encouragement to make greater in-game purchases.
	Corporate culture	Impact on building the mission, vision, and values that incorporate sustainable development.	Positive	Real	Long-term perspective	Own operations	The impact stems from the adoption of the ESG Strategy.	The Ten Square Games Group has adopted an ESG Strategy, which includes a set of actions outlining the Group's approach to Sustainable Development. The goals of the Strategy address a wide range of important ESG issues, particularly focusing on social aspects. The implementation of the Strategy's goals will ensure the mitigation and management of risks. The Strategy assumes that, as a result of these actions, the Group will have a positive impact on its stakeholders.
	Whistleblower protection	Impact on building trust through the application of best practices that go beyond compliance with the Whistleblower Protection Act.	Positive	Real	Long-term perspective	Own operations	No	Ten Square Games Group, within the existing due diligence processes, is building a whistleblowing system that goes beyond the regulatory framework of the Whistleblower Protection Act.
	Corruption and bribery	Impact on formulating the business model's resilience to corruption and bribery events through the voluntary implementation of preventive mechanisms.	Positive	Real	Long-term perspective	Own operations	No	The Ten Square Games Group implements actions aimed at managing corruption risk based on its Anti-Corruption Policy. These actions include adopting the appropriate policy and providing training for individuals working for TSG.

The business model of Ten Square Games S.A. is based on the ability to reach the right target audience and create a space within the online entertainment world that they will want to regularly return to. Recognizing the needs of the end customer and the ability to meet them are fundamental to the actions taken by Ten Square Games S.A.

In the case of implementing changes to the game that do not receive user approval, the Company is forced to revise its actions and changes to the product. In this context, the influence of the end user on the product development strategy should be considered significant.

A detailed description of the products in terms of their impact on end users is provided in ESRS – 4.

Risks and opportunities:

ESG topic	Name of the risk/opportunity	Description	Risk factors
S1 – Gender equality and equal pay for work of equal value	Risk of incidents arising due to unconscious bias and discriminatory practices in recruitment	Due to the lack of clear recruitment guidelines, irregularities may arise in the recruitment processes. Applicants for positions at TSG may not be assessed solely based on objective criteria related to the job specifications, which could lead to discrimination. As a result of such incidents, the company could face financial and reputational losses.	<ul style="list-style-type: none"> labor market conditions in the IT industry lack of an established and structured inclusive recruitment process
E1 – Climate Change	Risk of disruption in supply chains	Due to sudden weather events, there may be disruptions and interruptions in electricity supply, which could affect the availability of services and products from TSG suppliers, the ability to conduct TSG's own operations, either directly or indirectly, as well as the ability to use TSG's products.	Sudden weather events intensifying in climate change scenarios
E1 – Climate Change	Risk of the need for more detailed reporting on sustainability issues	The EU imposes increasingly stringent reporting requirements on companies regarding sustainable development. This may result in the creation of obligations that require conducting studies on TSG Group's products, the execution of which will incur significant costs, or the failure to carry them out may lead to penalties.	Regulatory trends
E1 – Climate Change	Risk of increased energy prices due to the high-emission energy mix in Poland or other countries	The Polish energy mix is one of the most emissions-intensive in the EU. In a scenario of a strong response to climate change and consistent increases in carbon allowance prices, energy from non-renewable sources may become more expensive, which will directly impact operational costs.	Regulatory trends
E1 – Climate Change	Opportunity to attract customers interested in products that help mitigate the climate crisis.	The opportunity lies in reaching new audiences for TSG's products, for whom actions taken to mitigate climate change could be a factor in their purchasing decision.	Market trends and IPCC reports
S1 – Gender equality and equal pay for work of equal value	Risk related to a pay gap exceeding 5%	Risk related to the consequences of exceeding the 5% threshold of the uncorrected pay gap, as established in Directive 2023/970.	<ul style="list-style-type: none"> Lack of actions effectively addressing the pay gap Lack of broader research analyzing and explaining the pay gap – adjusted pay gap Specificity of employment at TSG and the specifics of calculating the unadjusted pay gap
S4-Privacy	Risk related to the violation of data protection regulations	<p>This risk may arise from both unauthorized access to data and its improper processing by a company employee. Privacy breaches by an employee can take various forms, including:</p> <ul style="list-style-type: none"> Unauthorized access to user data stored in the company's systems, Disclosure or leakage of data due to error, negligence, or intentional action, Improper management of personal data (e.g., storage or processing beyond the authorized scope), Failure to comply with IT security protocols, such as using personal devices for data processing or not implementing security measures to control system access, Manipulation of user data, such as editing, deleting, or using it in ways that violate the company's privacy policy. <p>Violations of GDPR and other data protection regulations may result in:</p> <ol style="list-style-type: none"> administrative sanctions, including substantial financial penalties, loss of trust from players and business partners, which could negatively impact the company's reputation, costs associated with investigations, potential user claims, and the implementation of additional data protection measures. 	<ul style="list-style-type: none"> Granting employees permissions beyond their job responsibilities or lack of control over access to systems processing personal data. Use of weak passwords. Security vulnerabilities that may allow unauthorized access to databases. Lack of tools for logging and analyzing employee access to data, which may hinder the detection of irregularities. Employees may use personal devices for data processing, increasing the risk of data leaks.
S4 – Responsible Marketing Practices	Risk related to communication about changes in the functioning of TSG games	Risk related to introducing changes in the game that are not well understood by players. Developing new functionalities and implementing them in the game is a time-consuming process. If players are not adequately prepared for such changes, it may lead to revenue loss due to player churn or unintended use of the feature, which could disrupt the in-game economy.	Introducing a feature without supporting the change with appropriate communication to players.

From an opportunity perspective, a thorough analysis of past in-game events and player opinions about these events will provide the Company with insights into their business potential. When analyzing this information, the Company will consider both player feedback and data such as generated payments and player engagement.

Regarding the risk of the need for more detailed sustainability reporting, the Company has established an interdisciplinary ESG Team, coordinated by the Director of IR, PR, and ESG. Members of this team oversee the compliance of sustainability reporting with legal regulations. Any issues that raise concerns are continuously analyzed and discussed by team members. If changes are required in the scope of collected and analyzed data, this information is communicated to the Company's Management Board, which makes the final decisions on these matters. The Company has prepared for the reporting and data collection process in the field of sustainability with the support of an external entity to mitigate risks in this area.

Regarding the risk of supply chain disruptions, the Company has no direct means of preventing or securing itself against such occurrences. The most significant risk for the Company and the Group is a disruption in supply chains that directly affects the availability of mobile phones. As Ten Square Games is a mobile game developer, factors that could impact the availability and pricing of mobile phones pose a risk to revenue streams. To minimize this risk, the Company's products would need to be available on other platforms.

As for the risk of rising energy prices due to the high-emission energy mix in Poland or other countries, this would mainly impact the cost of maintaining the Company's headquarters. The Company monitors changes in energy prices and developments in Poland's energy mix. Currently, the Company does not actively manage this risk. The cost of energy is included in the fees associated with leasing office space in the building where the Company's headquarters is located. If there are significant changes in energy costs, the Company will explore alternative energy procurement options for its needs.



IRO-1

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

Materiality assessment

Ten Square Games Group conducted a comprehensive materiality assessment in 2023.

The methodology used for the assessment was adapted to comply with the requirements of the CSRD directive and the new European Sustainability Reporting Standards (ESRS). The materiality assessment process was carried out by an external entity – the company MATERIALITY.

The outcome of this assessment was the mapping of ESG risk areas, which can then be integrated into internal risk control systems. The materiality assessment was conducted using the MAX 4 methodology – MATERIALITY ASSESSMENT MATRIX, fourth edition.

The study considered the following sources of information, among others:

- » Analysis of aggregated source data from various stages of the assessment,
- » Benchmarking analysis of 21 gaming companies from Poland and abroad,
- » A comprehensive survey conducted among a group of 17 individuals, including members of the Management Board and senior management,
- » Surveys and structured interviews with 5 external stakeholders.

As part of the assessment, the level of risk related to material topics was examined. The risk analysis was part of the financial materiality parameter assessment. The topics were analyzed using two dimensions: the level of risk and the level of opportunity.

No separate operating segments have been identified within the TSG Group. Therefore, comparable entities included in the materiality assessment were those operating in the field of computer game publishing, which constitutes the core business activity of Ten Square Games Group.

In accordance with the double materiality principle, a topic was considered material and subject to disclosure if it was assessed as material from an impact materiality perspective, financial materiality perspective, or both.

Impact materiality

Monitoring of impacts was closely linked to the identified types of activities and business relationships of the Group, as well as the value chain, which was developed by a working group representing various areas of the Group's operations and different perspectives. The value chain formed the basis for analysing the impacts generated by the Group, including an assessment of the Group's suppliers (which also included the Group's contractors and business partners), its products and services, organizational structure, end customers and users of the Group's products, as well as end-of-life equipment and waste.

Stakeholders affected by the company were identified based on the areas of activity within the value chain. Impact materiality parameters were assessed by the scale and relevance of the stakeholder groups to the Group (including their share in revenue, costs, capital provision, etc.). The significance of a given activity or the Group's impact on particular stakeholder groups was also assessed.

The Company considers a topic to have a material impact if the impact materiality is at least important ($IM > 2$), the risk is higher than average ($R > 2$), or the opportunity is greater than average ($S \geq 2$).

The hierarchy of impact materiality was defined using four parameters. Three of them—(i) severity of the impact, (ii) scope of the impact, and (iii) possibility of remediation—determine the magnitude of the impact. The fourth parameter is its likelihood.

Financial materiality

The financial materiality parameters applied in the materiality assessment included:

1. Magnitude of the risk or opportunity – this defines how significant the consequences would be for Ten Square Games Group if a given risk materialised. In the case of opportunities, magnitude refers to the potential positive outcomes if the opportunity arises and is seized.
2. Likelihood of the risk or opportunity – this defines how probable it is for the given risk or opportunity to occur in the context of the Group.

The scales used to assess risks and opportunities were as follows:

RISKS RISK SEVERITY SCALE	OPPORTUNITIES OPPORTUNITY SIGNIFICANCE SCALE
critical or very serious consequences of the risk	very significant opportunities
serious consequences of the risk	significant opportunities
above-average consequences of the risk	above-average opportunities
below-average consequences of the risk	below-average opportunities
minimal or minor consequences of the risk	minimal or minor opportunities
no risks	no opportunities

Probability of risk/opportunity:

(i) present, (ii) probable, (iii) possible, (iv) unlikely, (v) remote, (vi) impossible.

Inclusion of stakeholder opinions

Stakeholders impacted by the company were identified based on the areas of activity within the value chain.

As part of the materiality assessment process, interviews and surveys were also conducted with representatives of various stakeholder groups.

Incorporation of materiality assessment results into ESG management

Sustainability-related risks are assessed in a manner consistent with other risks — in terms of their likelihood, impact on the company's operations, impact on its financial performance, and overall impact on the company. This ensures that sustainability-related risks are neither overlooked nor given undue preference over other types of risks.

Ten Square Games has not yet implemented a formal process for managing sustainability-related matters. The company is currently preparing for sustainability reporting. In 2023, the Group conducted an advanced materiality assessment involving various internal and external stakeholder groups, in accordance with ESRS regulations.

In 2024, based on the findings and recommendations from the materiality assessment, Ten Square Games developed its ESG Strategy. Moreover, throughout 2024, the identified impacts, risks, and opportunities were re-evaluated and their descriptions updated.



ESRS S1

OWN WORKFORCE

SBM-2

Stakeholder interests and perspectives

Ten Square Games considers employee feedback a vital part of its management process and the foundation for building an organizational culture based on dialogue and mutual respect. The company actively encourages employees to share their opinions, ideas, and suggestions through regular employee surveys, a dedicated "Idea Box," ongoing meetings with the Management Board (so-called "Couch Talks"), and an established anonymous reporting system that ensures safe expression of views.

Every opinion submitted by an employee is thoroughly reviewed and considered. Ten Square Games takes employee feedback into account to improve the work environment and internal processes. Outcomes of actions taken based on employee input are communicated accordingly, for example via the internal Slack messenger or during company-wide meetings. The Pulse Check process — used to gather and analyze employee feedback — is conducted quarterly, allowing the company to monitor shifts in employee needs and expectations. The effectiveness of implemented actions is evaluated through subsequent surveys and employee engagement indicators.

This approach allows the company to continuously integrate the employee perspective into its operations, ensuring that their rights and wellbeing remain an integral part of Ten Square Games' strategy and business model.

Ten Square Games identified employees as a key stakeholder group in the materiality assessment process. Their perspectives were gathered during the consultation stage via surveys, individual interviews, and thematic workshops. Employees had the opportunity to express their expectations and insights regarding social and labor-related topics, and their input formed a crucial part of the recommendations used to shape the Group's ESG Strategy.

As part of the ESG Strategy development, Ten Square Games conducted thematic workshops dedicated to each topic identified as material in the materiality assessment. These workshops included employees representing various departments across the company, ensuring a multifaceted view of key issues. As a result, the Group's ESG Strategy was shaped in a way that reflects the real needs and expectations of its employees.

In 2024, no labor unions operated within the company. However, selected employee representatives participated in the workshops.

SBM-3

Material impacts, risks, and opportunities and their interrelation with the strategy and business model

The issues described in relation to material impacts, risks, and opportunities and their interrelation with the strategy and business model apply to all Ten Square Games Group employees.

During the identification of impacts related to own workforce, TSG identified three material topics along with associated risks and opportunities:

Working conditions:

- » Work-life balance.

Equal treatment and equal opportunities for all:

- » Gender equality and equal pay for work of equal value,
- » Diversity.

The TSG Group has not identified any risks related to the occurrence of forced or compulsory labor or child labor within its operations, including those arising from activities in countries with increased risk of such practices. Therefore, the Group does not address these topics in this Report.

No negative impacts on own employees have been identified due to the nature or location of Ten Square Games Group's operations.

The main business activity of Ten Square Games Group is the development of mobile games. Employees of the Group, regardless of the form of employment, work in offices located in Wrocław, Warsaw, and Verona. Managing risks and maximizing opportunities related to employees is key to the business success of Ten Square Games Group. The Group consistently invests in employee development, health, well-being, and the creation of a positive organizational culture. The Group's management model focuses on people, encouraging openness to innovation and fostering a work environment that supports creativity and collaboration. In the opinion of the Management Board, these topics are crucial for unlocking the team's full potential and ensuring the company's long-term success in the competitive mobile gaming market.

The majority of individuals cooperating with the Group—either under employment contracts or other arrangements (including civil law contracts or B2B contracts)—are information and communication technology specialists. In 2024, the average number of people employed by Ten Square Games Group under employment contracts was 204, while the average total number of people employed across all contract types was 288. This number does not include members of the Supervisory Board.

The company has not identified any risks to its own workforce arising from transformation plans or other actions related to achieving climate neutrality.

The organization has not identified operations exposed to significant risks of forced or child labor. The company operates in the creative industry, which employs highly specialized professionals with unique skills that are not easily replaceable.

The Group has not identified any risks arising from exposure or dependency related to individuals with specific characteristics within its own employment structure.

The company has not defined any groups of employees who are particularly exposed to specific occupational risks.

Individuals with specific characteristics refer to employees whose individual traits or health conditions may make them more vulnerable to certain working conditions or risk factors. These may include people for whom certain aspects of the work environment could pose above-average burdens or hazards. However, no such groups requiring a dedicated approach have been identified within the company's workforce structure.

S1-5

Objectives related to managing material negative impacts, enhancing positive impacts, and managing material risks and opportunities

The strategic objectives in this area include:

1. Building an inclusive and friendly work environment,
2. Eliminating pay inequalities,
3. Fostering employee development.

Short-term actions supporting the achievement of these goals include:

- » Adoption of diversity-related policies,
- » Joining the Diversity Charter and organizations supporting women's careers in the gaming industry,
- » Introducing a diversity clause in job advertisements.

Medium-term actions supporting the achievement of these goals include:

- » Building the image of an organization that values and promotes diversity.

Long-term actions supporting the achievement of these goals include:

- » Achieving gender balance in employment – the percentage of individuals in leadership roles will be at least equal to the percentage of the underrepresented group within the entire organization,
- » Calculating the adjusted gender pay gap and implementing actions to minimize it, ultimately reducing it to 0%,
- » Introducing pay transparency for employees,
- » Assessing training needs.

S1-6

Characteristics of the entity's workforce

The majority of individuals employed within the TSG Group, regardless of the form of employment, are information and communication technology (ICT) specialists. In 2024, the TSG Group employed 204 people under employment contracts. Of those employed, 65.2% were men. An additional 119 individuals cooperated with the Group under agreements other than employment contracts. Most of the Group's employees perform their work in Poland.

The data presented applies to the entire TSG Group, as defined in the TSG Group's financial statements. All numerical data is reported as of December 31, 2024, based on headcount. The data has not been externally verified.

GENDER BREAKDOWN OF EMPLOYEES WITH EMPLOYMENT CONTRACTS IN THE TSG GROUP

	2024
Women	71
Men	133
Other	0
Not disclosed	0
Total	204

BREAKDOWN BY COUNTRIES WITH A SIGNIFICANT LEVEL OF EMPLOYMENT FOR EMPLOYEES HIRED UNDER EMPLOYMENT CONTRACTS IN THE TSG GROUP

	2024
Poland	175
Italy	29
Total	204

BREAKDOWN BY TYPE OF EMPLOYMENT CONTRACT FOR EMPLOYEES HIRED UNDER EMPLOYMENT CONTRACTS IN THE TSG GROUP IN 2024

	WOMEN	MEN	OTHER	NOT DISCLOSED	TOTAL
Number of employees hired under employment contracts, including:	71	133	0	0	204
Number of employees on permanent employment contracts	71	126	0	0	197
Number of employees on fixed-term employment contracts	0	7	0	0	7
Number of employees on full-time employment contracts	65	132	0	0	198
Number of employees on part-time employment contracts	5	1	0	0	6

BREAKDOWN BY TYPE OF EMPLOYMENT CONTRACT FOR EMPLOYEES ON EMPLOYMENT CONTRACTS BY REGIONS OF OPERATION IN THE TSG GROUP IN 2024

	POLAND	ITALY
Number of employees hired under employment contracts	175	29
Number of employees on permanent employment contracts	170	27
Number of employees on fixed-term employment contracts	5	0
Number of employees on employment contracts with no guaranteed working hours	0	2
Number of employees on full-time employment contracts	169	29
Number of employees on part-time employment contracts	6	0

EMPLOYEE TURNOVER RATE IN THE TSG GROUP IN 2024

	2024
Number of employees with employment contracts who left the organization during the reporting period	41
Turnover rate	21.10%

S1-7

Characteristics of non-employees constituting the undertaking's own workforce resources

Apart from permanent employees employed under employment contracts, the TSG Group also cooperates with many individuals under other arrangements. Non-employees (cooperating individuals) are defined as persons performing work for the TSG Group based on civil law contracts (such as mandate contracts, contracts for specific work, or self-employment under B2B agreements).

In 2024, the number of cooperating individuals in the TSG Group amounted to 119. The largest group consisted of individuals employed under civil law contracts (mainly B2B agreements). In 2024, non-employees constituted 37% of TSG Group's own workforce.

The presented data covers the entire TSG Group, in accordance with the definition provided in the TSG Group's financial report. The figures are shown as of December 31, 2024, and are presented in headcount. They were not subject to external verification.

INDIVIDUALS COOPERATING WITH THE ENTITY UNDER CONTRACTS OTHER THAN EMPLOYMENT CONTRACTS IN 2024

	WOMEN	MEN	OTHER	NOT DISCLOSED
Number of individuals working under civil law contracts (mandate contracts, specific-task contracts, and management contracts))	4	13	0	0
Number of individuals working under B2B contracts	23	79	0	0
Number of individuals working under temporary employment agency contracts	0	0	0	0
Total number of individuals cooperating with the entity under contracts other than employment contracts	27	92	0	0

S1-1 MDR-P

Policies related to own workforce

The TSG Group has implemented a number of policies to manage its impacts on individuals working for the Group. These include:

1. Code of Ethics;
2. Diversity Policy;
3. Policy on Counteracting Mobbing, Discrimination, Harassment, and Other Undesirable Behaviors.

Code of Ethics

The Code of Ethics applies to all TSG Persons, i.e. all individuals employed within the TSG Group under an employment contract, mandate contract, or any other civil law contract, as well as members of management or supervisory bodies.

By implementing the Code of Ethics, the Company commits itself and all individuals working on its behalf to adhere to internationally recognized Human Rights and protection standards, in particular:

1. The Universal Declaration of Human Rights;
2. The Charter of Fundamental Rights of the European Union;
3. The 10 Principles of the United Nations Global Compact;
4. The Conventions of the International Labour Organization (ILO);
5. The OECD Guidelines for Multinational Enterprises;
6. The UN Guiding Principles on Business and Human Rights.

The Code covers the following thematic areas:

- » equal treatment and prevention of discrimination,
- » prevention of mobbing,
- » prevention of harassment, including sexual harassment,
- » freedom of association,
- » prohibition of forced or compulsory labor, child labor, and human trafficking,
- » general occupational health and safety (OHS) rules,
- » prevention of conflicts of interest and corruption,
- » personal data protection and confidentiality of information,

- » general principles for reporting misconduct, further elaborated in the Whistleblowing Procedure,
- » fair competition principles,
- » external stakeholder relations,
- » respect for the natural environment,
- » whistleblowing and reporting of irregularities.

The Code is subject to annual reviews, and its implementation and oversight are the responsibility of the ESG Team of the Ten Square Games Group.

The policy has been published on the Ten Square Games S.A. intranet as well as on a public Slack channel used within the TSG Group as the main communication platform.

Diversity Policy of the Ten Square Games S.A. Capital Group

The Diversity Policy applies to all TSG Persons, i.e. all individuals employed within the Ten Square Games Group under an employment contract, mandate contract or any other civil law agreement, as well as members of the management or supervisory bodies.

The purpose of adopting this Policy is to effectively manage diversity within the Group.

To deepen the understanding of the topic among TSG Persons, the Policy defines diversity and emphasizes that diversity is protected and promoted only when human rights and fundamental freedoms are guaranteed—most importantly, the freedom and equality of all individuals in their dignity and rights.

In this Policy, the TSG Group commits to creating a workplace free from discrimination and other undesirable behaviors, and to treating all entities it interacts with fairly, including contractors and players.

The policy also includes commitments to:

- » Building diverse teams;
- » Adhering to the principle of equal opportunities;
- » Creating a friendly work atmosphere;
- » Applying transparent recruitment criteria;
- » Following the principle of open doors and dialogue to reduce communication barriers and ensure every TSG Person has free access to information about actions and initiatives undertaken by the TSG Group;
- » Supporting TSG Persons in balancing professional, private, and family life;
- » Preventing discrimination, harassment, and mobbing, as more specifically addressed in the Policy on Counteracting Mobbing, Discrimination, Harassment, and Other Undesirable Behaviors.

The policy also imposes an obligation on TSG Persons to report any violations in accordance with the Internal Reporting Procedure.

The policy is available to all applicable individuals via the Intranet system, and for any issues related to its content, TSG Persons may contact the legal department through the email address provided in the policy or via the communication tools used within the TSG Group.

The policy is subject to annual reviews. The Management Board of Ten Square Games S.A. is responsible for its implementation. The management boards of subsidiaries are required to implement an equivalent policy in their respective companies. The policy was adopted on August 5, 2024, and no changes were made to its content during the reporting period.

Policy on Counteracting Mobbing, Discrimination, Harassment, and Other Undesirable Behaviors

The TSG Group has implemented a policy aimed at counteracting mobbing, discrimination, harassment, and other undesirable behaviors to foster a workplace that upholds fundamental human and labor rights. The goal is to ensure an environment free from all forms of mobbing, harassment, unequal treatment, discrimination, and other inappropriate behaviors—built on mutual respect, trust, and collaboration—while encouraging creativity and freedom of expression to deliver the best products for our players.

This policy applies to all TSG Persons, meaning everyone working for the TSG Group under an employment contract, mandate contract, other civil law agreements, and members of the management or supervisory boards.

The policy obliges all TSG Persons not to engage in any behavior that could be considered harassment (including sexual harassment), mobbing, discrimination, unequal treatment, or other undesirable conduct. It also requires them to prevent such behavior by others within the TSG environment and respond to any signs of such conduct—either directly, by opposing the behavior, or by reporting the circumstances surrounding it.

The policy explicitly lists the following grounds for potential discrimination: gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, creed, sexual orientation, type of employment contract (fixed-term or indefinite), and type of employment (full-time or part-time).

TSG Persons are also obligated to report any violations of this policy in accordance with the Internal Reporting Procedure. If there are any doubts regarding reporting, individuals may contact their Leader, a member of the HR department, or the Legal Department. Additionally, TSG Persons can approach these individuals or departments at any time for consultation or support if they are the subject or witness of inappropriate behavior.

The policy is available to all applicable individuals via the Intranet. For any issues related to its content (including interpretation or implementation), TSG Persons may contact the Legal Department via the email address provided in the policy or by using the communication tools applied across the TSG Group.

The policy is subject to annual reviews. The Management Board of Ten Square Games S.A. is responsible for its implementation. Management boards of the Group's subsidiaries are required to implement an equivalent policy within their respective entities. The policy was adopted on August 5, 2024, and no changes were made during the reporting period.

The overarching policy on human rights is the Code of Ethics, which is described in the disclosures above. It addresses the topics indicated in the OECD Guidelines for Multinational Enterprises, as clearly stated in its content. The TSG Group's Code of Ethics defines rules, including the rejection of and active opposition to forced labor and child labor.

General provisions regarding occupational health and safety are included in the Code of Ethics, which applies across the entire TSG Capital Group. More detailed health and safety provisions are outlined in the internal work regulations of the respective TSG Group companies. All TSG Group entities ensure that employees receive mandatory health and safety training before beginning their duties, as well as periodic training thereafter.

As of the date of this report's publication, Ten Square Games Group has not identified any stakeholder groups with characteristics that would make them particularly vulnerable to the impacts described in its materiality assessments.

S1-3

Processes for remedying negative impacts and channels for raising concerns by own workforce

The Ten Square Games Group has implemented a range of procedures to address and remedy potential negative impacts on its own workforce. Employees and collaborators have access to multiple channels through which they can report concerns, suspected violations, or undesirable behaviors in a safe and confidential manner.

The Group operates a Whistleblower Procedure, which outlines the rules and mechanisms for reporting breaches of internal policies, ethical standards, or legal regulations. Reports can be submitted via: a dedicated internal reporting form, email contact with designated persons from the Legal or HR departments, anonymous or confidential submissions through the WhistBoard platform.

Reports submitted under the Whistleblower Procedure are carefully reviewed and assessed by appointed individuals, and where justified, corrective and remedial actions are implemented. The identity of the reporting person is protected in accordance with applicable data protection laws and internal procedures.

In addition to the Whistleblower Procedure, the Group has implemented the following internal policies, which also contain specific provisions on reporting and handling violations: Code of Ethics, Diversity Policy, Policy on Counteracting Mobbing, Discrimination, Harassment, and Other Undesirable Behaviors.

All TSG Persons (employees and collaborators) are encouraged to actively report any violations of the abovementioned policies. The Group promotes a culture of openness and trust, where speaking up is not only permitted but welcomed as an essential element of maintaining a safe, inclusive, and ethical work environment.

These channels are regularly communicated through the company's internal communication systems, including Slack and the Intranet, ensuring that all individuals working within the Group are aware of their rights and the processes available to them.

Equal pay

S1-1 MDR-P

Policies related to remuneration

The TSG Group places great emphasis on fair remuneration, recognizing it as one of the key elements in building employee engagement and the organization's long-term success. The Group's approach is based on principles of fairness and aligning salaries with market standards and individual employee performance. The materiality of this topic is highlighted by the results of the double materiality assessment, in which working conditions were identified as a material issue for the Group.

An important role in the remuneration system is played by TSG's Remuneration Regulations and the Diversity Policy, which emphasizes the principle of equal treatment regardless of gender. For this reason, the TSG Group eliminates all forms of discrimination and bases salaries solely on objective criteria: skills, experience, and performance. The Group has implemented the principles of equal treatment and diversity management across recruitment, development, promotion opportunities, benefits, succession planning, and remuneration.

S1-4 MDR-A

Actions taken to implement policy objectives

The TSG Group ensures that the rules for determining remuneration are clearly communicated to employees. To ensure competitive compensation, the Group conducts a salary benchmarking analysis twice a year within the industry in which it operates. The salary review process is clearly communicated to employees. TSG's HR department prepares both team leaders and employees for conversations regarding proposed raises to ensure that the process runs smoothly and professionally.

Employee remuneration at TSG is supplemented by a wide range of non-salary benefits, available to all employees regardless of their type of employment. In 2024, this included access to a cafeteria platform where employees could select benefits best suited to their needs. These included subsidies for private healthcare, Multisport cards, and the Ask Henry concierge platform.

Additionally, Ten Square Games provides employees with a budget for training and participation in industry conferences. Employees also have access to free breakfasts and healthy snacks such as fruits and vegetables in the office. The company offers extra days off during the holiday season and the option to join an attractive group life insurance plan.



S1-5

Remuneration-related goals

In the TSG Group's strategy, specific goals have been defined in the area of remuneration. By the end of 2025, the adjusted gender pay gap within the Group will be calculated. In the medium-term horizon, set until 2030, actions will be undertaken to minimize this adjusted gap. The TSG Group's ambition is to reduce the pay inequality index to 0%.

At TSG, pay equality means ensuring fair compensation for all employees, regardless of gender, age, origin, or other characteristics unrelated to competencies or responsibilities. In this context, the adjusted pay gap refers to differences in remuneration between groups of employees with similar qualifications and comparable positions, after accounting for factors such as experience, scope of duties, and level of responsibility.

In the short-term horizon, defined as the period ending in 2025, the Group will also assess employee training needs, update career paths for key employee groups, and implement training monitoring systems. These efforts will be continued in the medium term by developing comprehensive career path maps.

Working conditions

S1-1 MDR-P

Policies related to working conditions

At the TSG Group, the main document defining the rights and obligations of all employees, as well as standards related to safety and work organization, is the Work Regulations. An additional informational section on health and safety (OHS) rules is available on the company intranet.

S1-4 MDR-A

Actions taken to implement the assumptions of the policies

TSG Group operates in EU countries where employment conditions and practices are strictly regulated by law. TSG Group bases its activities on two main pillars: compliance with the Labour Code, as the overarching external document governing the rights and responsibilities of employers and employees, and internal regulations designed to ensure a safe working environment.

To this end, TSG Group conducts regular employee opinion surveys in the form of anonymous Pulse Check questionnaires. The aim of such surveys is to understand how employees assess their work experience, allowing the identification of areas for improvement and the implementation of appropriate changes within the organization.

TSG Group is committed to ensuring working conditions that promote a balance between professional careers and private life or other personal needs. Creating a friendly workplace that supports work-life balance is not only an important aspect of sustainable development, but also a key factor affecting employee productivity, engagement, and loyalty.

In addition to providing attractive working conditions, development opportunities, and social support, TSG Group supports employees returning to work after maternity/parental leave and encourages participation in charitable activities, as well as sports and cultural events.

S1-11

Social Protection

Ten Square Games S.A., which employs the vast majority of the Group's workforce, operates under the provisions of the Polish Labour Code. This legislation guarantees all employees protection against income loss due to major life events such as illness, unemployment, workplace accidents, acquired disabilities, parental leave, and retirement. All employees of Ten Square Games are offered the same social and material benefits regardless of the type of employment contract (fixed-term/permanent), working hours (part-time/full-time), or place of work. Foreign subsidiaries operate under local regulations governing the employee-employer relationship.

Ten Square Games offers its employees access to a private healthcare program across Poland. Under individually tailored medical subscription packages, all registered employees have access to both general and specialist medical consultations, comprehensive diagnostic tests, and preventive care programs. For employees who wish to additionally secure themselves financially against unforeseen life events, Ten Square Games provides a group life insurance program. Life insurance is one of the foundations of financial security. Employees can join the group insurance plan and benefit from conditions they would not receive through individual insurance. Participation in the insurance program is voluntary. TSG Group collaborators are also eligible to take advantage of the insurance option.

S1-5

Objectives related to policy implementation

In the ESG Strategy of the Ten Square Games Group, the objectives related to policy implementation have been defined under three key points:

- (i) we will build an inclusive and friendly work environment;
- (ii) we will eliminate pay inequalities;
- (iii) we will ensure the development of our employees.

A similar objective has not been defined in the TSG Group Strategy within the meaning of the ESRS.



S1-14

Occupational Health and Safety Indicators

NUMBER OF INDIVIDUALS WITHIN THE UNDERTAKING'S OWN WORKFORCE COVERED BY THE ORGANIZATION'S OCCUPATIONAL HEALTH AND SAFETY SYSTEM IN 2024

	2024
Number of employees with employment contracts covered by the occupational health and safety management system	204

In 2024, no work-related accidents were reported by employees or collaborators of the TSG Group. No days off due to work-related accidents were recorded either.

The TSG Group does not collect data on the number of days lost due to poor health. In 2024, as well as in previous periods, there were no reported cases listed in the International Labour Organization's occupational diseases register.

S1-10

Adequate pay

In 2024, all employees of the TSG Group received remuneration above the minimum wage.

S1-16

Remuneration metrics (Pay gap)

Under the ESRS framework, the gender pay gap is defined as the difference in the average level of remuneration between female and male employees, expressed as a percentage of the average remuneration level of male employees. TSG Group calculated the pay gap based on total remuneration. Base salary refers to the fixed amount specified in the employment contract, while total remuneration includes base salary as well as any additional amounts paid to the employee (including bonuses, benefits, overtime pay, and other monetary compensation). The above data was converted to gross hourly wages. The calculation includes employees with an employment relationship as of December 31, 2024.

PAY GAP	2024
Pay gap for employees employed under an employment contract at TSG Group	0%

COMPONENTS OF THE PAY GAP CALCULATION FORMULA ACCORDING TO ESRS FOR TSG GROUP (INCLUDING RORTOS):

	2024
Average gross hourly wage of men	PLN 72.62
Average gross hourly wage of women	PLN 72.33

Employee dialogue

S1-2 MDRP

Procedures for cooperation with own workforce and employee representatives regarding impacts

Ten Square Games regularly (once per quarter) conducts employee sentiment surveys in the form of anonymous questionnaires. This represents a direct form of engagement. Through this process, every person working for Ten Square Games has the opportunity to express their opinion and openly report positive or negative impacts that affect or may affect them. The company analyzes the survey results each time and, if needed, takes appropriate action. Insights from the surveys are taken into account when shaping employment and working conditions at Ten Square Games. Due to their regularity and repeatability, the results also provide an opportunity to analyze employee sentiment and impacts over time. The HR department of Ten Square Games S.A. is responsible for organizing the survey and analyzing its results. A similar survey is conducted at the subsidiary Rortos.

Additionally, the Management Board of the company regularly meets with all employees to explain the situation of the TSG Group and its main plans. During these meetings, employees can ask questions directly to the Management Board or submit them in advance via a dedicated form.

The Management Board also meets regularly (once a month) with all leaders in the Group to jointly discuss financial results and progress in the implementation of strategic plans.

An open communication culture at Ten Square Games is also supported through the internal Slack channel, where all important information about the Group's activities is shared on an ongoing basis, and employees are encouraged to comment and share their insights.

In accordance with the provisions of the implemented Code of Ethics, the TSG Group respects freedom of association and upholds principles that enable employees to organize and join employee organizations, including trade unions, in accordance with applicable laws. In 2024, no trade unions operated within the TSG Group. The Management Board collaborated with appointed employee representatives.

The Ten Square Games Group has not identified any employee groups within its own workforce that are subject to impacts due to individual characteristics or specific vulnerabilities.



S1-4

Taking action on material impacts on own workforce and applying approaches to manage material risks and seize material opportunities related to own workforce, and the effectiveness of these actions

The TSG Group has implemented a number of initiatives aimed at ensuring employee health and safety, including:

- » A medical care package – providing employees with access to comprehensive healthcare, as well as preferential terms for their families,
- » Regular occupational health and safety (OHS) training,
- » Psychological support,
- » Preventive support – promoting health prevention and regular check-ups,
- » Additional benefits – including health insurance and sports cards.

The TSG Group complies with the provisions of the Labour Code and undertakes activities that support work-life balance, including offering a hybrid work model. TSG also complies with regulations on overtime, including proper tracking and remuneration. Salaries are reviewed regularly to ensure they remain competitive and fair. The company also ensures pay equity across similar roles.

Feedback is of high importance at TSG. Four times a year, the company conducts a Pulse Check survey, allowing employees to confidentially express their opinions about working at TSG. Participation in the survey is voluntary.

The organization is committed to gender equality and neutrality in pay – TSG makes every effort to ensure that remuneration is determined solely by merit-based factors. The company regularly invests in employee skills development through internal and external training and has introduced mechanisms to provide employees with tools to address any potential violations.

In 2024, the employee-elected representatives served as the point of contact for discussions with the Management Board on working conditions and employee well-being.

All of the above topics are described in detail in the thematic ESRS S1 sections of this report, within the chapters relating to the organization's own workforce.

The impacts identified through the double materiality analysis are reflected in the organization's business model.

S1-8

Scope of collective bargaining and social dialogue

S1-1 MDR-P

Policies on collective agreements

The TSG Group ensures full freedom of association for its employees. In 2024, there was no trade union or collective agreement in place within the Group.

MDR-A

Actions taken in the area of collective agreements and social dialogue

The Management Board of Ten Square Games consulted all employee-related matters required by law with the elected employee representatives. The Board strives to consistently ensure high standards of working conditions and employee relations across the Group by maintaining transparent and responsible management practices, as well as through ongoing dialogue with employees—described in detail in other sections of the report.

S1-15

Work-life balance of employees

The TSG Group takes care to maintain a healthy work-life balance for its employees. This balance can be a key factor in achieving well-being, job satisfaction, and a high level of effectiveness in task execution. TSG Group makes every effort to create a safe and friendly work environment where employee well-being is a standard.

S1-1 MDR-P

Policies relating to employees' work-life balance

There is no unified policy dedicated to work-life balance in the TSG Group, nor are there any current plans to introduce one.

However, TSG supports its employees in achieving a healthy level of balance through a range of ongoing initiatives and programs.

S1-4 MDR-A

Actions taken to implement the assumptions of the policies

The TSG Group regularly asks employees about their well-being, overall wellness, and perceived stress levels through the quarterly Pulse Check survey. Based on the responses, TSG implements initiatives aimed at improving working conditions.

The company offers employees access to the AskHenry.pl service, providing each person with a personal assistant tailored to their daily life and individual needs. This solution supports employees in handling everyday tasks, saving time, and improving their quality of life. It is available to all employees and collaborators of TSG.

Additionally, TSG offers 15-minute neck and back massages for employees and collaborators at the Wrocław office.

In 2024, employees were offered the opportunity to participate in an additional first aid training, which was taken up by 66 individuals working with or for TSG.

Well-being and physical health directly contribute to job effectiveness and overall life satisfaction. TSG encourages employees to take advantage of the solutions available within the organization, including:

- » co-financing of the MultiSport card,
- » a bicycle storage room along with lockers and showers for those commuting to work by bike,
- » medical care as part of a healthcare subscription,
- » cancer prevention screenings.

At TSG, work is organized in a hybrid model. At Ten Square Games S.A., the general rule is three days of office presence and two days of remote work per week.

The Group aims to positively impact employees' well-being in the office by offering healthy and nutritious breakfasts and organizing shared lunches on the last Friday of each month. TSG also prioritizes team integration by allocating dedicated budgets for quarterly team-building events and twice-yearly company-wide gatherings.

Additionally, employees receive a birthday bonus credited to their benefits account.

Every employee and collaborator of the TSG Group also has access to psychological consultations, with a monthly subsidy provided to support mental well-being.

Stay in the Game is a program designed for mothers on maternity leave and upon their return to work. To support employees during the early stages of childcare, the TSG Group offers the following to new mothers:

- » Individual English lessons during maternity leave – scheduled at convenient times to allow learning while caring for an infant,
- » Flexible working hours during the first month after returning – mothers can adjust their working hours in the critical initial weeks of their return, even if not working full time, while Ten Square Games pays the full monthly salary for this transitional period.

Additionally, the company prepares a newborn starter kit for every employee and collaborator welcoming a baby.

TSG also supports employees at life milestones such as marriage – newlyweds receive a voucher for a hotel of their choice, redeemable at their convenience.

The company finances the rental of a sports hall where fans of physical activity can play basketball, volleyball, and more together on a weekly basis. Every year, TSG also organizes a Children's Day event, bringing together the families of employees for a day of fun and integration.



S1-15

Work-life balance indicators

BASIC DATA ON PARENTAL, CAREGIVING, AND CHILDCARE LEAVES IN THE TSG GROUP IN 2024

	WOMEN	MEN	OTHER	NOT DISCLOSED
% of employees on employment contracts entitled to parental leave out of the total number of employees on employment contracts	29.58%	15.04%	0	0
% of employees on employment contracts entitled to parental leave who took parental leave	100%	5%	0	0

Equal treatment and equal opportunities for all

TSG Group aims to create a work environment where people feel valued and respected.

S1-1 MDR-P

Policies related to the equal treatment of employees

Diversity Policy at the TSG Group

In 2024, the TSG Group adopted a Diversity Policy. It is described in detail in section S1-1 MDR-P Policies related to own workforce.

S1-4 MDR-A

Actions undertaken to implement the policy objectives

The procedures supporting diversity at the TSG Group are overseen by the ESG team. In 2024, the implementation of the procedure was accompanied by internal training sessions and a knowledge quiz.

S1-5 MDR-T

Goals related to the implementation of policies and actions

The objectives of the TSG Group Strategy in this area, supported by the provisions of the TSG Group Diversity Policy, indicate the following key goals:

- » Building an inclusive and friendly work environment;
- » Eliminating pay inequalities;
- » Caring for employee development.

S1-9 Diversity metrics

DIVERSITY INFORMATION FOR EMPLOYEES EMPLOYED UNDER EMPLOYMENT CONTRACTS AT THE TSG GROUP IN 2024

	WOMEN	MEN	OTHER	NOT DISCLOSED
Total number of individuals, including:	71	133	0	0
Age group: over 50 years old	1	5	0	0
Age group: 30-50 years old	43	78	0	0
Age group: below 30 years old	27	50	0	0

The data presented in the tables was prepared by the TSG Group as of December 31, 2024. It has not been externally verified.

S1-12 Persons with disabilities

In 2024, the percentage of persons with disabilities employed by the TSG Group was 0.98%.

Prevention of Mobbing, Discrimination, and Other Unacceptable Behaviors

The TSG Group stands firmly against all forms of mobbing, discrimination, harassment, and unethical behavior. Such actions are referred to within TSG as “unacceptable behaviors” and are considered a serious breach of employee duties.

S1-1 MDR-P

The content of the policy related to counteracting mobbing and discrimination has been described in detail in the section dedicated to Policies concerning own workforce.

S1-4 MDR-A

Actions taken to implement the assumptions of the policies

Violation of the prohibition against unacceptable behavior is treated as a serious breach of employee duties. Consequences are enforced in accordance with the provisions of the Labor Code and the Work Regulations. Engaging in unacceptable behavior or creating a situation that encourages it may result in disciplinary or even criminal liability.

In 2024, Ten Square Games S.A. organized a series of trainings related to the implementation of the policy. Dedicated training sessions were held for TSG Leaders – team managers – as well as for all other employees.

Information about the Policy is published on the Ten Square Games intranet and includes not only the full policy text but also details about unacceptable behaviors, including definitions and procedures for reporting them.

S1-5 MDR-T

Objectives related to the implementation of policies and actions

The primary objective of the Policy on Counteracting Mobbing, Discrimination, and Other Unacceptable Behaviors is to prevent such behaviors and to support the development of positive relationships between employees, fostering a friendly work environment. The policy outlines a clear stance towards individuals who either create conditions conducive to unacceptable behaviors or engage in such actions themselves, treating them as a breach of fundamental employee duties. In such cases, Ten Square Games S.A., as the employer, may take appropriate action in accordance with labor law provisions, including the Work Regulations. No specific target has been set in this area by the TSG Group within the meaning of ESRS.

S1-17

Incidents, complaints, and significant impacts on the observance of human rights

In 2024, the TSG Group did not record any reports concerning unacceptable behavior, including discrimination or harassment. There were also no incidents related to human rights.

S1-13

Training and skills development Metrics

TSG Group operates in a rapidly evolving market and therefore places particular importance on employee development. Development initiatives are carried out by providing appropriate tools and access to specialized knowledge. TSG Group offers employees the opportunity to independently choose their development path within the organization and to participate in selected development initiatives.

S1-1 MDR-P

Policies related to training and development

At TSG, there is a training and development policy that defines the rules for accessing training within the Group. The Management Board of TSG believes that knowledge and skills drive the company's growth. The Group operates in an industry that never sleeps and is constantly evolving.

This policy outlines all the ways the development budget can be used to expand knowledge and grow together with TSG. The policy applies to all TSG team members employed under employment contracts, B2B agreements, contracts of mandate, and contracts for specific work – both full-time and part-time.

As part of the policy, TSG team members may apply to participate in:

- » Internal training sessions organized by TSG,
- » External training courses, conferences, the purchase of books, and other educational materials.

Team leaders approve training requests and decide on the level of TSG funding, taking into account the team's priorities and the available budget.

TSG has also developed career paths for one of the largest professional groups within the organization and plans to prepare similar paths for other professional groups in the coming years.

S1-4 MDR-A

Actions taken to implement the assumptions of the policies

Mandatory training package – mandatory training at the Group consists of a set of sessions required by law and internal TSG regulations.

Onboarding training package – training sessions held once a month for all new employees and collaborators, aimed at effectively introducing them to the organization.

Language training – company-funded English lessons for all employees wishing to improve their language skills. The company also funds Polish lessons for foreign employees and co-funds lessons for their family members to support their adaptation in Poland.

External training – agreed individually within the annual budget.

S1-5 MDR-T

Objectives related to the implementation of policies and actions

The objectives related to the TSG Group's training policy are not explicitly defined in the TSG Group Strategy. As a rule, they are closely tied to the business goals of individual teams and to the overall TSG strategy. The main objectives of the TSG Group in this area are:

- (i) to enhance the qualifications of employees and collaborators by acquiring new skills and knowledge,
- (ii) to increase employee engagement through investment in their professional development.

The implementation of the policy is systematically monitored through: regular evaluation of training and development activities based on participant feedback and analysis of results (using surveys, knowledge tests, and attendance indicators). Reporting and review of activities are conducted by the HR Department.

NUMBER OF TRAINING HOURS FOR TSG GROUP EMPLOYEES IN 2024

	WOMEN	MEN	OTHER	NOT DISCLOSED
Senior management	32.0	n/d	0	0
Employees in managerial and supervisory roles	211.50	212	0	0
Other employees on employment contracts	949.80	3244.30	0	0
Total number of training hours	1193.30	3456.30	0	0

Language learning has not been included in the total number of training hours.

NUMBER OF DEVELOPMENT CONVERSATIONS PER EMPLOYEE EMPLOYED UNDER AN EMPLOYMENT CONTRACT IN THE TSG GROUP IN 2024.

WOMEN	MEN	OTHER	NOT DISCLOSED
1.62	1.67	0	0

The data presented in the tables was prepared by the TSG Group as of December 31, 2024. It has not been externally verified.



S4 CONSUMERS AND END USERS

SBM-2 Stakeholder interests and opinions

Ten Square Games Group operates in the mobile gaming market, with its products targeted at adult users. The Group conducts its business in accordance with applicable laws. Use of the Group's products is entirely voluntary, with no external factors compelling users to choose them.

The Group takes actions to combat hate speech and any form of discrimination within its games. To this end, it has developed a Code of Conduct for Players, which clearly defines unacceptable behaviors and their consequences. The Group actively listens to the opinions of its users, including those related to its products. These insights are often considered when updating and improving its offerings. The Group regularly conducts tests of new game features with players, and findings from these tests influence the final design of the implemented features. In addition to testing, the Group organizes online meetings with players to collect feedback on specific games, introduced functionalities, and communication practices. These activities are coordinated by the Customer Service Department, which shares the results of surveys and player conversations with individual product teams so that player insights can be taken into account in the game development process.

SBM-3 Material Impacts, Risks and Opportunities and their interconnections with the strategy and business model

At the heart of Ten Square Games Group's strategy lies the player and their needs. For this reason, player interaction with the Group's products plays a key role in shaping both the strategy and the business model. The Group's business success depends on player satisfaction and their willingness to engage regularly with the product. Ten Square Games' business model is built on the ability to reach the right target audience and create an online entertainment space they will want to return to consistently. Identifying the end user's needs and the ability to meet them is the foundation of all actions undertaken by Ten Square Games. When game changes are introduced that do not gain user approval, the Group must revise its approach and make changes to the product. In this context, the end user's influence on product development strategy is considered material.

The scope of disclosures covers the entire group of consumers and end users.

The Company does not create products that are inherently harmful or increase the risk of chronic diseases. The Group's products are virtual goods. Information on how to use the games is available on the Ten Square Games website and directly within the game application.

The Group's products are virtual in nature and therefore do not have packaging, labels, or printed user manuals. Information on how to use the games is available on the Ten Square Games website and within the game itself. In case of any questions about gameplay, every player has access to the game's terms of use, in-game tutorials, and can contact the customer support center, which responds within 48 hours at the latest.

The Group's products are intended for adult users; therefore, individuals under the age of 18 do not have access to them. Additionally, the specialized nature of the products makes them unappealing to younger audiences. The Group aims to target its marketing communications toward individuals who enjoy spending their free time outdoors. Currently, the Company has no way of verifying players' financial situations at the time of purchase to ensure that their spending does not negatively impact their personal budgets. However, the Company continuously analyzes trends related to how individual players spend money within the game.

A detailed demographic profile of players is presented in ESR5 2, section SBM 3.

The Company condemns all forms of discrimination and utilizes automated chat filters to help identify vulgar, offensive, or discriminatory language. In cases of verbal aggression, the Company reserves the right to block access to the game for players who behave inappropriately. In exceptional situations, the Company encourages any player who feels they have been the target of aggression to cooperate with law enforcement authorities.

If players have any doubts regarding how to use the game, they can access the game's Terms of Use, virtual in-game guides, or contact the customer support center, which responds no later than within 48 hours.

The player can access all game functionalities without enabling sound – this ensures that individuals with hearing impairments are not excluded from the player community. The games in the Company's portfolio are primarily based on visuals, and written communication is limited to in-game chats, which are not adapted for players with visual impairments.

Ten Square Games is a publisher of mobile games operating under the F2P (free-to-play) model, meaning that the vast majority of the Group's revenue comes from microtransactions made by players. As a result, the Group's future growth opportunities are closely tied to the effective management of its impacts on, and relationships with, consumers and end users.

The Group has not identified any risks arising from impacts and dependencies related to end users with specific characteristics.

Individuals with specific characteristics are users whose individual traits, health conditions, or other specific circumstances may result in increased sensitivity to certain aspects of products or services. This may include, for example, the intensity of audiovisual stimuli, game mechanics requiring specific skills, or other elements that may have a particular impact on selected user groups.

Based on available data and analyses, the Company has not identified any end-user groups that may be exposed to elevated risks associated with the use of its products or services.

Nevertheless, the Company collects feedback from end users regarding individual games or the solutions introduced within them.

To ensure player safety, the Group makes every effort to appropriately label the products of its companies, including:

- » labeling games with an age rating appropriate for a given territory on major digital platforms (Google, Apple);
- » providing information about the game's rating on its dedicated website, mobile application, selected related marketing materials, and product pages;
- » including a warning regarding photosensitivity.

Ten Square Games Group also takes measures to restrict access to certain game-related content for underage users by implementing age-gating on dedicated websites and product pages on digital game distribution platforms.

The Group aims to reach people who enjoy spending their free time outdoors with its product marketing communications.

Among the potential opportunities stemming from impacts and dependencies related to consumers and end users, the Company has identified the following:

1. technological development,
2. expansion of the gaming community,
3. effective management of the microtransaction system.

Enhancing technology and user engagement mechanisms can increase user involvement and loyalty, which may lead to higher revenues from microtransactions. Implementing innovative solutions, such as AI-powered mechanisms, may accelerate the introduction of new game features, help distinguish the Company's products on the market, and attract new users.

On the other hand, actively building and maintaining a strong player community can contribute to improved user retention and greater willingness to make microtransactions. Additionally, the teams responsible for game development organize events, contests, and create spaces for players to share their experiences, which can further increase player engagement.

Ten Square Games ensures that its pricing strategy remains fair to users while also being profitable for the company.

Among the risks identified by the Group are primarily:

1. changes in legal regulations,
2. evolving consumer expectations and behavior,
3. risks related to privacy protection and data security.

New regulations concerning mobile games and microtransactions may impact Ten Square Games' business model. Additionally, the business model is significantly influenced by the regulatory policies of major platforms such as Facebook, Google, and Apple. Changes in consumer protection laws, restrictions on microtransactions, or data privacy regulations may require adjustments that could be costly or affect revenue.

In addition, rapidly changing trends and user preferences may pose a challenge to maintaining engagement and interest in the games. Misunderstanding the expectations of end users can lead to a decline in product popularity and reduced revenues.

As a company operating in the digital space, Ten Square Games must pay particular attention to the protection of users' personal data. Data security breaches may not only result in legal and financial consequences but can also negatively affect the company's reputation.

To date, no specific user groups have been identified as being at greater risk due to the use of the Group's products.



S4-1

Policies related to consumers and end users

Good relationships with and among players

Ten Square Games Group is committed to building long-lasting and transparent relationships with its users. That is why the Group communicates the rules of using its services and products in a clear and precise manner.

S4-1 MDR-P

Policies related to building relationships with players

Terms of Service

The Terms of Service of Ten Square Games S.A. and Rortos define the rules for using the games and services offered by the Group, as well as the way in which the impact of these services on end users is managed. The Terms set out the fundamental rights and obligations of players, ensuring transparency of rules, user protection, and the Group's compliance with legal regulations.

The Terms apply to all users accessing the Group's services, but clearly state that Ten Square Games' services are intended for adults only. Using the games requires acceptance of the Terms of Service and confirmation of the user's age, which constitutes one of the key mechanisms for limiting access to services for minors.

S4-4 MDR-A

Actions undertaken to implement the Terms of Service

The company employs various mechanisms to minimize risks related to the impact of its games on users. The Terms of Service define, among other things, the rules for moderating content published by players, including the ability to report violations and the procedures for verifying and enforcing sanctions against those who breach community standards. Additionally, the Terms outline regulations concerning the protection of users' personal data and financial resources.

The Terms of Service are regularly updated to reflect the evolving regulatory environment and market practices. All significant changes are communicated to users, and the Company strives to ensure the highest possible level of security and transparency in the use of its services.

S4-5 MDR-T

Objectives related to the implementation of policies and actions

The objective of the TSG Group is to build transparent relationships with players. The Terms of Service provide each player with clear information about the rules of using the Group's products and serve as the first step in building long-term relationships with users. No targets have been established in this area within the meaning of the ESRS.

Privacy Policy

The Privacy Policy of Ten Square Games S.A. sets out the rules for collecting, processing, and protecting the personal data of game users and the Company's services. The document ensures transparency in data processing practices and informs users about their privacy rights and the security of their information.

The Policy aims to ensure continuity and protection of personal data processing within the business operations. It also ensures that personal data is processed securely and in compliance with legal requirements. The Management Board of the TSG Group is kept informed of any GDPR breaches and complaints submitted to the Personal Data Protection Office (UODO).

The Policy applies to all end users using the services of Ten Square Games S.A., regardless of the platform or region. At the same time, the Company clearly states that its services are intended exclusively for adults and that it does not knowingly collect personal data from individuals under the age of 18.

The Privacy Policy governs the processing of user data, taking into account key aspects such as:

- » Ensuring the protection of personal data,
- » Processing information solely to the extent necessary to provide services,
- » The possibility to delete an account or request access to, rectification, or deletion of data,
- » Defining the rules for sharing data only with entities cooperating for the purpose of service provision,
- » Implementing technical and organizational measures to secure data against unauthorized access.

The Privacy Policy is subject to regular reviews and updates to align with changing regulatory requirements and best market practices.

S4-4 MDR-A

Actions taken to implement the provisions of the policy

The TSG Group respects all rights of end users, employees, and other data subjects, and their privacy is protected. Every individual has access to privacy notices, which provide complete information on how their data is processed and how to contact the Data Protection Officer. All affected individuals are informed in the event of a personal data breach. The company applies mechanisms to minimize the risk of privacy violations, including data encryption, restricted access to information, and continuous system security monitoring.

S4-5 MDR-T

Objectives related to the implementation of policies and actions

Transparency in data processing and providing users with control over their privacy are key elements in building trust and a positive user experience for the games of Ten Square Games S.A. The content of the policy is available on the Company's website. The main objective of the TSG Group is to ensure a high level of personal data protection and to continuously raise its standards. To date, no targets have been defined in this area within the meaning of the ESRS.

Cookie Policy

The Cookie Policy of Ten Square Games S.A. defines the rules for collecting and using cookies and other data storage technologies on the Company's website. The document governs how TSG processes information about users, ensuring transparency of activities and compliance with applicable privacy regulations.

The policy applies to all users of the Ten Square Games S.A. website and specifies that users can manage their cookie preferences via a dedicated banner displayed during their first visit to the site. Users may accept all cookies, reject their use (except those necessary for the website's operation), or choose specific categories they consent to.

The Cookie Policy outlines the classification of cookies by their function and purpose. The Company's website uses analytical tools such as Google Analytics to monitor traffic and Meta Platforms Pixel for marketing purposes. The policy provides users with the ability to manage consents for individual types of cookies and informs them on how to delete cookies through browser settings.

S4-4 MDR-A

Actions taken to implement the policy

The Cookie Policy is regularly updated to reflect technological changes and legal requirements regarding privacy protection.

S4-5 MDR-T

Objectives related to the implementation of policies and actions

A transparent approach to user data management and the ability to control cookie settings are key elements in ensuring compliance with regulations and building user trust in the services offered by Ten Square Games S.A. The full content of the policy is available on the Company's website.

Code of Conduct for Players

The Ten Square Games S.A. Code of Conduct for Players defines the rules of interaction within the player community and serves as a tool for managing the impact of the Company's services on end users. The document outlines acceptable and unacceptable behavior in online games, promoting standards of fair play, mutual respect, and a safe gaming environment.

The Code is addressed to all users of Ten Square Games S.A. titles, regardless of platform or region. At the same time, the Company clearly states that its services are intended exclusively for adults, and acceptance of the terms of service along with age confirmation is a prerequisite for accessing the games.

The Code clearly defines rules for preventing abuse, discrimination, and inappropriate behavior, supporting the creation of an inclusive and safe environment. It introduces mechanisms that allow players to report violations and outlines consequences for those who breach the rules, including warnings, temporary bans, or permanent account removal.

In terms of user health and well-being, the Code emphasizes responsible gaming and maintaining a balance between gameplay and daily life. It highlights potential risks, such as excessive engagement, and points to organizations that offer support if needed.

The full content of the Code is available on the Company's website directly and via the Terms of Service. It has been communicated to users through appropriate channels.

TSG Group's activities related to respecting human rights for every stakeholder stem from the general commitment expressed in the Code of Ethics, described in disclosure S1-1.

S4-4 MDR-A

Actions taken to implement the provisions of the Code

The Company carried out an information campaign regarding the newly introduced Code. Additionally, it conducted a survey to assess players' awareness of the document, promoting its existence. A total of 43,821 people responded to the survey. Half of the respondents were aware of its existence.

S4-5 MDR-T

Objectives related to the implementation of the Code

TSG Group's objective is also to foster fair and ethical relationships among players. No targets have been established in this area under the ESRS framework.

However, the Company has set medium-term goals in this area, including the development of a "Healthy Gaming Practices" section for players. Other player relations goals include:

- (i) establishing a process for collecting and analyzing player feedback,
- (ii) exploring the technical feasibility of self-limitation mechanisms in games,
- (iii) preparing a "Get Help" section with support hotline numbers.

Procedure for Handling Reports of Abuses in Clan Chats

In September 2024, Ten Square Games S.A. clarified and updated its procedure for collecting and handling player-reported abuse cases. The aim of the changes was to streamline the verification process and ensure consistent and appropriate responses to violations of the rules across the entire gaming community at a global level.

The updated procedure includes 8 categories of abuse reports, each automatically tagged in the reporting system. These categories are: infringement of intellectual property rights, hate speech, threats of violence, sexual exploitation of minors, other forms of abuse, trafficking of illegal goods, promotion of terrorism and extremist violence, and fraud (e.g. phishing attempts). These categories allow for more accurate classification of reports and appropriate responses in each case.

Players can report violations using the dedicated "Report" function available next to each message in the clan chat. Once reported, the system automatically logs predefined data.

After receiving a report in the HelpShift system, the moderation team identifies the reported message by using the timestamp or its position on the clan wall. If a violation is confirmed, the following actions may be taken: (i) removal of the message from the chat, (ii) clan chat ban – a temporary or permanent restriction on chat usage, (iii) account ban – a temporary or permanent suspension of game access.

All actions taken are automatically communicated to the user, and a case ID is recorded in the system.

Every user has the right to appeal a decision through the reporting system. In the event of an appeal, the user receives information about the reason for the penalty and its duration. Each case is analyzed individually, and in case of doubt, consultations are held with the team lead and the legal department. The penalty system takes into account the severity and recurrence of violations.

S4-4 MDR-A

Actions taken to implement the procedure

The user support team conducted an informational campaign among players to communicate changes in the reporting rules for clan chat violations. This additional method of reporting violations aims to make it easier for players to report any instances of violations or errors without leaving the game.



S4-5 MDR-T

The goals related to the implementation of the procedure

Ten Square Games S.A. strives to ensure a safe environment in its games, and the changes made in September 2024 to the abuse reporting procedure enable more efficient tracking of reports and appropriate responses to behavior that violates the rules. Systematic improvement of moderation and reporting processes is an essential element of managing player community interactions and adhering to ethical standards and legal regulations.

The Support department at Ten Square Games S.A. is responsible for implementing this procedure. Its content is available for those handling the procedure within the company intranet.

Social Engagement Policy

The policy was developed to outline and explain the key principles and objectives of the TSG Group in the area of social engagement and environmental protection, and applies to all TSG Employees, including those employed under contracts of employment, contracts for specific work, or other civil law agreements, as well as members of the management or supervisory bodies.

The policy regulates matters related to sponsorship and promotion, general principles for providing financial support, and financing for socially engaged and sponsoring activities.

The policy is based on the results of a materiality survey conducted among TSG stakeholders in 2023, which confirmed that social and employee-related issues are particularly significant and form key areas to be included in the TSG Group's ESG (Environmental, Social, and Governance) strategy.

The policy applies to actions taken by TSG and its subsidiaries in areas where TSG and/or its subsidiaries have the greatest impact, namely:

- » Equal treatment, equal opportunities, diversity, and inclusivity;
- » Environmental protection, climate change, and adaptation to climate change;
- » Relationships with players;
- » Initiatives supporting the development of local communities;
- » Charitable support in case of urgent needs.

The policy also imposes an obligation on TSG employees to report any violations of it in accordance with the procedures outlined in the Internal Reporting Procedure.

The policy is available on the company's internal intranet, and for any issues related to its content (including its application, interpretation of specific provisions), TSG employees can contact the legal department via the email address provided in the policy or through the internal communication tools used by TSG.

The policy is subject to annual reviews, and the responsibility for its implementation lies with the Management Board of each Company.

The policy was adopted on August 5, 2024, and no changes have been made to its content during the reporting period.

S4-4 MDR-A

Actions taken to implement the policy's objectives

The policy sets the directions for social engagement of the TSG Group, also in the area related to end users. It serves as a guideline aligning these actions with the objectives outlined in the TSG Group's ESG Strategy.

S4-5 MDR-T

Objectives related to the implementation of the policy

Ten Square Games S.A. aims for the effective implementation of the TSG Group's ESG Strategy. The main objective of the TSG Group's Social Engagement Policy is to ensure the alignment of the actions taken with the Group's Strategy, including in the area of relationships with players.

S4-2

Processes of collaboration regarding the impact with consumers and end-users

The group has not identified any groups of end-users negatively affected by the company's products or services. The group collects feedback from end-users regarding individual games or solutions introduced in them. The user feedback research is linked to the schedule of work on individual games and depends on the significance of the changes being made. The company has adopted an internal set of customer service best practices. Feedback collection from players is carried out according to the principles described in this document. However, it is not a formalized process. The company does not engage in formal agreements with any group of players or their representatives, so the process of collecting feedback from players does not result in any formal agreement or document.



S4-3

Processes for remedying the consequences of negative impacts and channels for reporting issues by consumers and end-users

The TSG Group aims to establish long-lasting relationships with its customers by ensuring the clarity and transparency of the communications sent to them. Users can report any issues through the customer service system, which is available 24/7. In cases where a user cannot access a paid service due to a game error, the company provides compensation and corrects the error that caused the issue.

Each player can contact the company via the contact form available on the company's website. Additionally, the contact form is also accessible directly from within the application. Players who have VIP status can further contact a customer service representative. The standard of customer service contact at Ten Square Games exceeds what is commonly applied in the mobile gaming market.

The dedicated CRM system allows for real-time tracking of incoming submissions. On a monthly basis, the customer service team prepares an analysis of the submissions and, along with a set of recommended actions, passes the reports to the individuals responsible for product development. A set of indicators has been prepared to monitor trends in this area.

For submissions from players, the main role in the Group's structure is played by the Support department, which aggregates player submissions of similar nature and takes actions to eliminate the causes of the submission if they result from errors on the Group's side. The number and reasons for submissions are passed to the business owners to contract actions for elimination.

Information about the main categories of submissions is provided in the form of a report to the board member responsible for overseeing the Support department. A live data dashboard is continuously updated to monitor complaints, and a summary of the results is sent monthly to the Product Owners of the main products for corrective action.

Information about possible forms of submission is made available on the company's website and within the app of each game. As part of preventive actions, every modification to a product or service is consulted with players, allowing for the early elimination of issues that could potentially lead to complaints.

All player submissions are recorded and analyzed to improve processes.

In 2024, Ten Square Games received a total of 227,138 submissions from players. In the case of Hunting Clash, the highest number of submissions concerned in-game events and technical issues. Similarly, for Fishing Clash, the largest number of submissions was related to in-game events. The second largest category of submissions concerned missing rewards in player accounts. Both products also received submissions regarding technical issues and difficulties logging into the game.

Apart from analyzing the categories of submissions and response time, the Group does not conduct other measurements of the effectiveness of available channels.

The submission channels are available to all players 24/7.

The company regularly conducts customer satisfaction surveys regarding customer service. Based on the results, it takes corrective or improvement actions to, among other things, raise users' awareness of the available communication channels with customer service.

The goal of Ten Square Games (TSG) is to provide end users with an easy-to-use channel through which dissatisfied customers can report issues with the services provided by the Group. Additionally, the company's goal is to ensure monitoring that allows for error elimination and continuous service improvement. Currently, the Group has not set specific objectives in this area within the framework of ESRS.

In the medium term, TSG Group will establish a process for collecting and analyzing player feedback. It will also explore the possibility of technical self-regulation mechanisms in games and introduce tools for filtering inappropriate language in chats, informing players how to handle such situations. Additionally, solutions for penalizing players who do not adhere to established rules will be implemented.

Actions in the area of user relations are continuously monitored by the user support department. The department regularly conducts surveys among players and organizes online meetings to gather feedback from them. The results of the surveys and discussions are forwarded to product teams, and the insights are used to improve processes or the development of products. The company ensures full confidentiality and anonymity for players when reporting inappropriate behavior or violations, eliminating the possibility of retaliation. Therefore, no additional procedures have been created.

S4-4

Taking actions related to significant impacts on consumers and end users, as well as applying approaches to manage significant risks and seize key opportunities related to consumers and end users, and the effectiveness of these actions

Actions in this area have been described when discussing each of the policies in this area.

S4-5

Objectives related to managing significant negative impacts, enhancing positive impacts, and managing significant risks and opportunities

The goal of Ten Square Games is to provide players with entertainment and relaxation while playing their favorite games. TSG promotes responsible gaming and healthy relationships between players. Games can have a positive impact on players by offering entertainment, building communities, promoting learning, and supporting mental health, but it is important to be aware of potential negative effects such as addiction, aggression, and health issues.

The pillars of actions concerning the impact on players:

- » transparent approach to communication,
- » ensuring players have control,
- » caring for a safe environment for players,
- » establishing community standards.



G1 BUSINESS CONDUCT

GOV-1 Role of administrative, supervisory, and management bodies

In the TSG Group, administrative, management, and supervisory functions are divided between three bodies:

- » The Shareholders' Meeting,
- » The Supervisory Board,
- » The Management Board.

A detailed description of the roles of the bodies and their expertise can be found in the GOV 1 and GOV 2 disclosures within ESRS 2.

IRO-1 The processes for identifying and assessing significant impacts, risks, and opportunities

The full process for identifying risks and opportunities is described in the IRO-1 disclosure within ESRS 2.

G1-1 Business Conduct Policies and Corporate Culture

TSG Group has implemented a series of policies and procedures related to business conduct. These include:

1. Anti-corruption Policy,
2. Conflict of Interest Prevention and Management Policy,
3. Confidential Information Protection Policy,
4. Intellectual Property Policy,
5. Compliance Policy,
6. Internal Reporting Procedure.

Anti-corruption Policy

The Anti-corruption Policy was implemented within TSG Group to assist TSG members in recognizing, preventing, and mitigating the risk of corruption and related abuses, as well as standardizing the principles of integrity and ethical conduct in both business relationships and any dealings with public authorities, in accordance with the applicable national, European Union, and international laws. Its goal is also to raise awareness among TSG members regarding the risks of corruption and how to minimize them.

The policy defines the phenomenon of corruption, providing examples, and focuses on issues such as preventing corruption, accepting and giving gifts, conflicts of interest, maintaining accounting records to accurately, reliably, and transparently reflect the financial and asset situation of TSG Group, making payments in accordance with TSG Group's standards and applicable laws, and financial involvement, including donations.

TSG Group provides its members with appropriate training on identifying corrupt events and preventing corrupt practices. The training aims to minimize the risk of abuses and raise awareness of issues related to corruption and other economic abuses.

Conflict of Interest Prevention and Management Policy

The Conflict of Interest Prevention and Management Policy has been implemented to prevent and manage conflicts of interest within TSG and to prevent any violation of TSG's interests, particularly by:

- » Assisting TSG personnel in identifying and preventing any situations where a conflict of interest could influence their behavior or business decisions, especially those that could prevent the person from acting in the best interest of TSG;
- » Providing TSG personnel with guidelines to recognize, prevent, and manage conflicts of interest that may arise as a result of activities or actions related to TSG's interests;
- » Preventing events that may lead to financial or reputational losses for the TSG Group. These events are understood to include both intentional actions by TSG personnel and external factors or actions independent of TSG personnel, which, through the implementation of appropriate procedures and control mechanisms, can be minimized or fully blocked.

The policy includes guidelines regarding:

1. Identifying relationships and events where a conflict of interest may arise;
2. Implementing controls and mechanisms to prevent the occurrence of conflicts of interest or to reduce their scope, as far as possible;
3. Monitoring and reporting all significant conflicts of interest;
4. Managing conflicts of interest, including the procedures to follow in case of unavoidable conflicts of interest and properly informing the individuals and entities involved;
5. The method of classifying specific behavior as a conflict of interest, along with examples.

Confidential Information Protection Policy

The Confidential Information Protection Policy was implemented to ensure that TSG Personnel have a basic understanding of what constitutes Confidential Information and Confidential Information as defined by MAR (Regulation (EU) No 596/2014 of the European Parliament and the Council of April 16, 2014, on market abuse and repealing Directive 2003/6/EC of the European Parliament and the Council and Commission Directives 2003/124/EC, 2033/125/EC, and 2004/72/EC) and how to protect it. It is the duty of each TSG Personnel member to adhere to and maintain the security and confidentiality of this information and handle it in the manner described in the Policy.

The policy applies to the obligation to maintain the confidentiality of Confidential Information and Confidential Information as defined by MAR for all TSG Personnel. The obligation to maintain confidentiality established by the policy extends beyond the relationship between the TSG Personnel and TSG Group and remains in effect even after the termination of employment, engagement, or contract with TSG/its Subsidiary, for the period specified in the relevant agreement or required by applicable law.

Intellectual Property Policy

The Intellectual Property Policy was implemented to ensure that TSG Personnel have a basic understanding of what Intellectual Property is, how to use it, and how to protect it. The policy establishes the principles for protecting TSG Group's Intellectual Property and using the Intellectual Property of other entities.

Intellectual Property, according to the Policy, includes, among others, the following categories that are important for the TSG Group:

- » works – this can include, for example: graphics, scripts, music, photographs, software programs (protection particularly covers source code and object code, but not algorithms);
- » trademarks – symbols, names, logos, or other identifiers used to identify products or services;
- » know-how – knowledge of processes, technologies, as well as applied solutions, ideas that are not widely known, and enable actions to be taken faster, more efficiently, and with better economic results; certain solutions may be patentable (protected as inventions) or considered trade secrets;
- » image – refers to the appearance or set of characteristics that individualize a person (individual), and in some jurisdictions (outside Poland), it may also apply to, for example, architectural objects;
- » database rights – refers to a collection of data or any other materials and elements organized according to a specific system or method, which required significant investment (quantitative or qualitative) for its creation.

Compliance Policy

This Policy applies to all TSG Personnel and to the management of all non-compliance risks within the TSG Group. It specifically outlines the following:

- » entities responsible for ensuring compliance within the TSG Group;
- » the most significant non-compliance risks;
- » principles of compliance behavior and guarantees for proper execution of the compliance function;
- » measures (mechanisms) aimed at preventing, detecting, and managing non-compliance risks and achieving the organization's strategic and operational goals in the field of compliance.

All the aforementioned business conduct policies apply to all TSG Persons, i.e., every individual employed by the TSG Group under an employment contract, mandate contract, or other civil law agreement, as well as members of the management or supervisory bodies. The policies also impose an obligation on TSG Persons to report any violations of these policies in accordance with the Internal Reporting Procedure.

These policies are available to all relevant individuals in the company's intranet system, and in all matters related to their content, TSG Persons can contact the legal department via the email address provided in the policies or through the communication tools used within the TSG Group.

The policies are subject to annual reviews, and their implementation is the responsibility of the TSG Group Management Board.

Internal Reporting Procedure

Ten Square Games S.A. has implemented an internal reporting procedure. This procedure has been introduced to regulate the principles and methods for reporting violations and taking follow-up actions within the TSG Group, as well as to ensure TSG Group's compliance with applicable whistleblower protection laws, particularly the Whistleblower Protection Act.

The procedure applies to individuals who may be considered whistleblowers under applicable laws, those involved in the reported issue, individuals assisting in making the report, and persons associated with the whistleblower.

The procedure regulates the principles of making reports, including anonymous ones, which TSG Group allows, and establishes reporting channels. Reports can be made by filling out an electronic form available at <https://tsg.whistboard.com/>. The Whistboard channel is also accessible through the Intranet and the TSG website at <https://tensquaregames.com/pl/kontakt/>.

The procedure also identifies the functions responsible for receiving and reviewing reports, regulates the verification process, the principles for taking follow-up actions, maintaining a report register, and making external reports. The procedure strictly prohibits any retaliatory actions against the whistleblower, anyone who assisted the whistleblower in making the report, or anyone associated with the whistleblower. [G1-1_05]

The reporting channel established under the procedure is available in Polish, English, German, Ukrainian, Spanish, Italian, and Russian, and it can also be used by external stakeholders who are not employees of the TSG Group.

All individuals processing the reports are properly authorized and are required to maintain impartiality and confidentiality, and in the case of a conflict of interest, they are excluded from participating in the review of the specific report.

The internal reporting procedure has been in effect at Ten Square Games S.A. since September 19, 2024, and its implementation is the responsibility of the Management Board of Ten Square Games S.A. The procedure is subject to annual reviews.

To ensure understanding and increase trust in the mechanisms established in the procedure, Ten Square Games S.A. points out the possibility of addressing any doubts regarding its application and understanding of individual provisions to the legal department, either personally, via the designated email address provided in the procedure, or through the communication tools used within the TSG Group.

Through the Whistboard channel, any violations concerning Ten Square Games S.A. and Rortos SRL can be reported. This channel is available not only to employees of the TSG Group but also to external stakeholders.

All individuals processing the reports are properly authorized and are required to maintain impartiality and confidentiality. In case of a conflict of interest, they are excluded from participating in the review of the specific report.

The corporate culture at TSG focuses on four core values within the TSG Group. These values are regularly discussed and promoted by the Management Board of the Company. Meetings with employees from across the Group, held at least twice a year, provide a platform for discussions about the company's values, their understanding, and their application in everyday work. These values include courage to explore, responsibility, collaboration, and the ability to adapt quickly to change. The regularity of these meetings ensures continuous reflection on corporate culture and its integration into the company's life. To further strengthen the understanding of the Company's values and the principles based on them, at the beginning of 2025, the Company adopted the Code of Ethics – a guide to the most important principles of conduct within the TSG Group.



The main values promoted by TSG are:

- » **Dare to Explore:** encouraging creativity, innovation, and learning from mistakes.
- » **Own It:** promoting responsibility, creativity, and independence.
- » **Grow Together:** supporting collaboration, personal and professional development within the team.
- » **Change Fast:** adapting to the dynamically changing market environment.

These topics are not only promoted during meetings but also serve as criteria for evaluation in recruitment processes and during employee assessments, highlighting their importance for TSG's organizational culture.

TSG offers specific incentives and tools for employees to support the corporate culture, including:

- » financing employee initiatives: demonstrates the management's support for innovation and employee engagement,
- » cultural fit assessment during recruitment: ensures that new employees will align with the company values,
- » regular employee evaluations: includes an assessment of employees' behavior in line with the organizational culture,
- » team-building events: organizing large integration events and smaller team meetings promotes collaboration and building interpersonal relationships.

The organizational culture at TSG is dynamic and evolves with the company, which is reflected in how the Board engages in its development and promotion. By focusing on key values and integrating them into daily operations, TSG creates a work environment that fosters innovation, responsibility, and mutual growth.

At TSG, procedures for quickly, independently, and objectively investigating corruption incidents operate within the framework of the Internal Reporting Procedure described above.

Considering the nature of Ten Square Games' operations, the functions most exposed to the risk of corruption are those related to:

- a. purchasing services and technology from external suppliers, e.g. marketing tools, cloud computing, software,
- b. negotiating cooperation terms with distribution platforms (e.g. Apple, Google), collaborating with advertising agencies, influencers, advertising partners, and expenses for promotional campaigns,
- c. access to user data and data privacy management.

G1-2 G1-6

Supplier Relationship Management and Payment Practices

The TSG Group does not have a policy regarding supplier relationships aimed at preventing payment delays. The lack of such a policy stems from the specific nature of TSG Group's operations, where in practice, there are no issues with payment delays. The Group ensures stable relationships with suppliers based on trust and partnership. Nearly 100% of invoices are paid on time. Polish suppliers generally set payment terms at 7-14 days, while foreign suppliers apply longer payment terms. The company is not involved in any legal proceedings related to payment delays.

G1-3

Prevention of corruption and bribery, and their detection

On August 5, 2024, the TSG Group implemented an Anti-Corruption Policy, which is described in disclosure G1-1. Any reports of violations of the Anti-Corruption Policy are reviewed in accordance with the principles for handling violations outlined in the Internal Reporting Procedure described in disclosure G1-1.

G1-4

Corruption or bribery incidents

Ten Square Games has not been subject to any convictions for violations of anti-corruption laws or bribery regulations. No fines have been imposed on the company or its subsidiaries for breaches of anti-corruption laws or bribery regulations. In 2024, no confirmed incidents of corruption or bribery were recorded.

G1-5

Political influence and lobbying activities

Neither TSG Group nor the parent company engaged in lobbying activities or political influence in 2024. The Group did not directly or indirectly finance any initiatives of this nature. TSG was also not a member of any lobbying associations.

None of the members of the governing, management, or supervisory bodies held comparable positions in the public administration during the 2 years preceding their appointment to the Company's bodies. Ten Square Games has no plans to engage in lobbying activities in the near future.

E1 CLIMATE CHANGE

GOV-3

Incorporating sustainability-related results into incentive systems

In 2024, the Compensation Policy did not link compensation components to the achievement of reduction targets for GHG emissions or other climate-related strategic objectives.

E1-1

Transition plan for climate change mitigation purposes

In 2024, Ten Square Games did not have a dedicated climate transition plan. The operational activities of the Group have a relatively small direct impact on the climate through greenhouse gas emissions. Ten Square Games does not have assets that could generate significant emissions within Scope 1. Efforts to reduce CO2 emissions are currently included in the ESG Strategy of Ten Square Games.

ESRS 2 SBM-3

Significant impacts, risks, and opportunities, and their interconnections with the strategy and business model

Ten Square Games Group conducted the identification and analysis of ESG risks, including risks and the resulting threats and opportunities in the areas of climate change, environmental issues, social matters, labor relations, and human rights. Identified risks and opportunities:

Risks:

1. Risk of disruption in supply chains
2. Risk of the need for more detailed reporting on sustainability issues
3. Risk of rising energy prices due to a high-emission electricity mix in Poland or other countries

Opportunities:

1. Opportunity to attract customers interested in products helping to combat the climate crisis

As of December 31, 2024, a scenario analysis of the resilience of the Ten Square Games business model to climate change has not yet been conducted.

ESRS 2 IRO-1

Description of the processes for identifying and assessing significant climate-related impacts, risks, and opportunities

The climate risk analysis was conducted in collaboration with an external consulting firm, following the AXIS® methodology (Amplification, eXclusion, Intensification, Seizure), in a four-step process that included: comparative, questionnaire-based, quantitative, and qualitative analysis. The process is based on assumptions in accordance with the ISO 31000 standard.

A total of 38 risks and their potential impacts, consisting of 12 opportunities and 26 threats to the organization, were analyzed.

After evaluating the probability and impact of each threat and opportunity, it was determined that 1 opportunity and 3 threats are of significant importance for Ten Square Games. Additionally, 3 opportunities and 10 threats were placed under monitoring and management in justified cases.

The following **time horizons** were adopted for the climate risk analysis:

- » 2023 – 2025
- » 2026 – 2030
- » 2031 – 2050

The probability is assessed on a scale of:

- » almost certain,
- » very likely,
- » likely,
- » rather likely,
- » rather unlikely,
- » unlikely,
- » very unlikely,
- » almost impossible



The impact is assessed on a scale of:

- » very high,
- » high,
- » moderately high,
- » moderately low,
- » low,
- » very low.

The described study identified the following groups:

Group A (Amplification) – high probability and low impact:

- » 2 opportunities,
- » 7 threats.

Group X (Exclusion) – low probability and low impact:

- » 7 opportunities,
- » 13 threats.

Group I (Intensification) – high impact and low probability:

- » 1 opportunity,
- » 3 threats.

Group S (Seizure) – high probability and high impact:

- » 1 opportunity,
- » 3 threats.

Ten Square Games S.A., as a mobile game production company, operates in the technology sector, which is characterized by a relatively low direct operational impact on the environment. However, like other digital entities, the Company's activities may be indirectly exposed to climate risks that affect its operations, value chain, and long-term strategy. The physical risks resulting from climate change may mainly concern the continuity of operations, including:

- » **availability of IT infrastructure and servers** – the company uses cloud services and external servers from providers. Extreme weather events, such as heatwaves or power outages caused by hurricanes, may lead to disruptions in the availability of servers supporting games and operating systems,
- » **disruptions in office operations** – the increased frequency of extreme weather events (e.g., floods, storms) may affect the availability and operation of the Group's offices, particularly in locations vulnerable to climate change,
- » **increased energy demand** – a rise in global temperatures may lead to higher cooling requirements for data centers, which could impact the costs and carbon footprint of IT infrastructure.

Regulatory, market, and social changes related to climate policy may impact the company's operations. Currently, due to the upcoming changes in regulations concerning sustainability reporting, it is not possible to determine the full extent of this impact.

E1-2

Policies related to climate change mitigation and adaptation

In 2024, the company did not have policies related to climate change mitigation and adaptation.



E1-3

Actions and resources related to the climate policy

Ten Square Games S.A., as a global mobile game producer, does not have a direct negative impact on the natural environment. However, through the global reach of its products, the Company can have both direct and indirect positive effects by raising ecological awareness among its players and engaging them in climate protection actions.

In 2024, Ten Square Games carried out a number of activities supporting climate education, both independently and in collaboration with external partners:

Make Green Tuesday Moves – cyclical climate actions in games

Since April 2024, on the first Tuesday of every month, the largest game of the Company – Fishing Clash – hosted events as part of the Make Green Tuesday Moves initiative. The aim of these activities was to raise players' awareness of the consequences of climate change and the possibilities of mitigating them in daily life. Additionally, Ten Square Games shared part of the revenue from dedicated in-game offers, supporting Planet Play – an organization focused on raising climate awareness through gaming. In total, in 2024, TSG donated nearly 61,000 PLN to Planet Play as part of these actions.

Green Game Jam – player and employee engagement

As part of the Green Game Jam, the Company not only organized an event in the game Fishing Clash but also conducted real environmental actions among employees, including cleaning the banks of the Oława and Oder rivers. Employees also participated in educational workshops highlighting the importance of water ecosystems for the city and its residents.

The Fishing Clash team actively engaged players to take action in the real world and share their initiatives on social media. To encourage participation, players who shared photos of their environmental actions received in-game rewards.

Earth Day Activation

Traditionally, Ten Square Games also participated in Earth Day celebrations by organizing a special event in Fishing Clash. As part of the event, players could earn virtual rewards for taking actions to protect the environment.

Donations for the protection of water ecosystems

The company supported the Global Nature Fund's initiatives with two donations of 10,000 EUR each:

- » the first donation was directed to a lake conservation program aimed at preserving biodiversity and improving water quality worldwide,
- » the second donation supported a project to strengthen resilience and improve fisheries management in the Magdalena River in Colombia, contributing to the protection of natural habitats and the promotion of sustainable fishing practices.

Player opinion survey on the role of games in climate education

In 2024, Ten Square Games, in collaboration with the United Nations Development Programme (UNDP), conducted a survey among players regarding the perception of games as a platform for raising awareness about climate change. The survey results showed above-average player engagement in environmental issues, confirming the potential of mobile games as an educational tool.

In 2024, Ten Square Games also engaged in a project to independently calculate its greenhouse gas emissions. The company held workshops with an external firm that helped identify emission sources and establish the necessary metrics to calculate emissions. As a result, the company was able to estimate CO2 emissions for the entire Group.

Types of expenditures of the TSG Group in 2024

TYPES OF EXPENDITURES	for the period 1.01.2024 – 31.12.2024
environmental activities	150 070
sponsorship activities	37 500
charitable activities	70 500
sports activities	4 444
educational activities	0
TOTAL	262 514

ORGANIZATION	for the period 1.01.2024 – 31.12.2024
Global Nature Fund	85 898
Sphaira Innovation AG	60 856
Milkywire AB	0
Tech to the Rescue Foundation	0
DevGAMM LLC	0
Fundacja Gospodarki i Administracji Publicznej	0
Other	115 760
TOTAL	262 514

E1-4

Objectives related to climate change mitigation and adaptation

In 2024, as part of the adopted ESG strategy for the TSG Group, the following strategic goals in the environmental area were set:

Short-term:

- » Setting a reduction target for Scope 1+2 emissions;
- » Setting a reduction target for Scope 3 emissions;
- » Organizing an annual initiative targeted at users and employees;
- » Engaging players in climate action – in-game events.

Medium-term:

- » Approval of reduction targets for emissions in SBTi;
- » Update of equipment purchase policies, business travel policies, and other policies regarding the procurement of low or zero carbon footprint equipment and services.

Long-term:

- » Reducing Scope 1 and 2 emissions to zero;
- » Approval of Scope 3 emissions reduction target in SBTi;
- » Organizing an annual initiative for users and employees, such as climate education initiatives within Playing for the Planet.

E1-5

Energy consumption and energy mix

In 2024, the electricity consumption of the Ten Square Games Group amounted to 280,561.32 kWh, and the thermal energy consumption was 350.45 GJ.

E1-6

Greenhouse gas emissions for Scope 1, 2, and 3 gross, and total greenhouse gas emissions.

The TSG Group is disclosing GHG emissions for the first time in this period, in accordance with the binding ESRS standards (Delegated Regulation (EU) 2023/2772 of July 31, 2023, supplementing Directive 2013/34/EU of the European Parliament and the Council regarding sustainability reporting standards) and in line with the principles, requirements, and guidelines outlined in the GHG Protocol Corporate Standard (The Greenhouse Gas Protocol A Corporate Accounting and Reporting Standard Revised Edition, GHG Protocol Scope 2 Guidance, GHG Protocol Corporate Value Chain [Scope 3] Accounting and Reporting Standard).

In some cases, the Group did not have enough data to estimate emissions according to the adopted methodology. In such cases (e.g., emissions related to the use of the Group's products by players), the Group decided to conduct an experiment to establish the necessary metric to perform the estimates.

Below, the Company provides calculations made for 2024.

Emissions for 2024 are presented in three scopes (Scope):

» **Scope 1:** direct emissions

Greenhouse gas emissions generated directly by the organization and its activities.

Examples: combustion of fossil fuels, refrigerant leaks. No such emissions were identified because the Company is not the owner of the office space in the building where it operates; it is a tenant, and it does not own a car fleet.

» **Scope 2:** indirect emissions related to energy

Emissions related to the consumption of electricity, heat, or steam by the organization. The Group made calculations based on invoices from the office owner in Wrocław and Verona, which the Group rents. Data on electricity, heat, and water for the subleased office space in Warsaw were estimated based on the square footage and the number of people using the small area. Example: electricity consumption.

» **Scope 3:** other indirect emissions

All other indirect emissions occurring upstream or downstream in the organization's value chain.

Examples: purchase of raw materials, purchase of services, business travel, transportation of goods, waste, use and end-of-life of sold products, extraction energy.

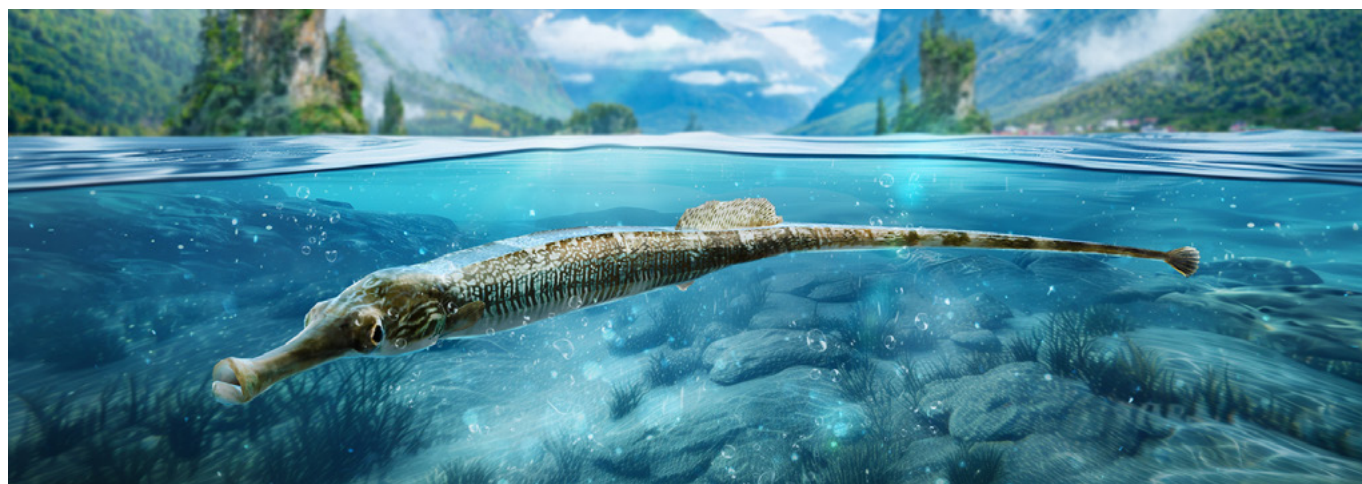
In Scope 3, the most significant emissions for the Group's operations are those related to the purchase of advertising services (Category 1 purchased services) and the use of the Group's products by players (Category 11 Use of products). The emissions estimates related to purchasing advertising services were based on the number of online ad impressions and the emission factor associated with their playback. To calculate emissions related to the use of the Group's products, the Company, in cooperation with an external consultant, conducted an experiment to create a metric necessary to estimate emissions in this regard. These estimates involve uncertainty regarding the accuracy of the calculations.

In the Scope 3 emissions calculations, the Company also considered Category 2 Capital goods, Category 5 Operational waste, Category 6 Business travel, Category 7 Employee commuting, Category 8 Rented assets, Category 12 End-of-life treatment of products, although their impact on the Group's emissions is much smaller. No other sources of emissions were identified in the Group.

The Group's structure does not include biogenic emissions.

GHG emissions in CO2 equivalent tons for TSG Group in 2024.

GHG EMISSIONS SCOPE	Emission size [tCO2e] in 2024
Greenhouse gas emissions Scope 1	N/A
Greenhouse gas emissions Scope 2	192
Significant greenhouse gas emissions Scope 3 (material categories)	4 196
Category 1: Purchased Goods and Services	3 789
Category 2: Capital Goods	14
Category 5: Operational Waste	56
Category 6: Business Travel	70
Category 7: Employee Commuting	179
Category 8: Rented Assets	4
Category 11: Product Use	81
Category 12: End-of-Life Treatment of Products	2



E1-7

Projects for the removal of greenhouse gases and the reduction of greenhouse gas emissions funded through carbon credits

The company did not utilize projects related to the reduction of greenhouse gases funded through carbon credits.

E1-8

Internal carbon pricing for greenhouse gas emissions

In 2024, Ten Square Games Group did not use Internal Carbon Price tools.

E1-9

Expected financial impacts arising from significant physical risks, transition risks, and potential climate-related opportunities

The company decided to use the exemption offered in Appendix C to ESRS 1 and, in the first year of reporting, did not estimate the financial impacts arising from significant physical risks, transition risks, and potential climate-related opportunities.

