



CD PROJEKT GROUP SUSTAINABILITY REPORT FOR 2023



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Foreword from the Joint CEO

[GRI 2-22]

Dear Readers,

I have the pleasure to invite you – for the first time in my role as Joint CEO of CD PROJEKT – to familiarize yourselves with the CD PROJEKT Group Sustainability Report for 2023.

Ever since I can remember – and I have been part of CD PROJEKT for nearly 20 years – maintaining responsible interaction with gamers, building team relations on the basis of mutual trust and respect, and being fair with our business partners have formed the cornerstone of our value set and work ethic. These aspects of our business, although articulated less frequently than issues related to development and publishing of games, continue to serve as our compass and guide our decision-making processes.

The business highlight of the past year was, without a doubt, the release of the Cyberpunk 2077 expansion titled Phantom Liberty; however, over the recent months we also invested a great deal of effort in improving the performance of the CD PROJEKT Group in all aspects of sustainability which we regard as material. Just as iteration forms a crucial component of the game development process, we at CD PROJEKT continue to reinvent our organization and operations, which enables us to discover smarter, more efficient and healthier approaches to carrying out work.

In 2023 we improved our process of reporting non-financial data and streamlined management of key non-financial aspects. Our second-ever materiality survey, which involved a broad community of stakeholders, produced a new list of ESG issues regarded as material for the CD PROJEKT Group. We also established an ESG Management Group, comprising top managers whose respective responsibilities include overseeing material ESG issues.

In the course of implementing our environmental obligations for 2023 we became the first gaming company in Poland to obtain an EU EMAS certificate. We set ambitious Scope 1 and 2 reduction goals for the Group, to be achieved by 2030; we also continued to seek new solutions and expand the renewable energy infrastructure at our Warsaw campus.

With regard to team management, despite a reduction in employment carried out in 2023, we consistently worked to improve the engagement of our employees. As a result, by December 2023 the team engagement score had increased to 72% - a 2pp increase compared to the end of the preceding year. In 2023 we also carried out a survey of career development barriers faced by our female employees. This resulted in a list of recommendations and action points for future years.

To better manage our value chain, in 2023 we improved our supplier vetting process and published the “Fair Play Code for Suppliers”. We also initiated educational activities in the scope of business ethics – all of which help us uphold high standards in our business dealings.



Details of our activities and our plans for future years are presented further below in this report.

Enjoy!

Michał Nowakowski
Joint CEO



01

ABOUT THE
REPORT



About the report

We hereby present to you the CD PROJEKT Group Sustainability Report for 2023 (“the Report”), which covers basic information about the CD PROJEKT Group, a description of key activities related to each aspect of sustainable development which have particularly strong long-term effects on our business, the way in which we handle each of these aspects, as well as notable risks and opportunities related thereto. The Report also summarizes our work towards accomplishment of social, environmental and governance goals, and declares our goals for the coming years.

This is our third sustainability report, with both previous reports having been published on a voluntary basis rather than under any legal obligation. In 2023 CD PROJEKT, for the first time ever, meets the criteria which, under the Accounting Act, mandate WSE traded companies to publish statements or distinct reports covering their non-financial performance indicators.

Scope of reporting

[GRI 2-3]

The information provided in the Report is consistent with the requirements of the Accounting Act, GRI Universal Standard and other international standards published by the Sustainability Accounting Standards Board (SASB).

Information presented in the Report is valid as of 31 December 2023 and covers the period between 1 January and 31 December 2023 unless indicated other-



wise. The sustainability reporting period is equivalent to the financial reporting period.

Information regarding management of ESG issues at CD PROJEKT and at the CD PROJEKT Group is published on an annual basis together with the CD PROJEKT Group’s annual report.

Boundaries of reporting

[GRI 2-2]

Given the character of the CD PROJEKT Group’s business activities, which involves significant business and organizational autonomy of member companies, as well as significant variability of their scale of operations and applicable legal constraints, the Group, in most cases, does not enforce uniform groupwide policies and procedures, applicable to all its subsidiaries (unless indicated otherwise in the Report). Each member company of the Group is responsible for introducing local policies and procedures adapted to the scope and scale of its activity, as well as to local legal requirements.

The list of companies covered by sustainability reporting for 2023 (namely, CD PROJEKT S.A. and GOG sp. z o.o.¹) does not include CD PROJEKT Inc., and is therefore not equivalent to the list of companies subject to consolidation in the Group’s financial statement. We proceed from the assumption that CD PROJEKT Inc. (whose financial results are subject to consolidation as a result of past decisions, but which does not currently meet consolidation criteria in force at the Group) – given the limited scale of its activities in 2023 – does not meet the materiality threshold in the context of this report, unless indicated otherwise.

¹ Both CD PROJEKT S.A. and GOG sp. z o.o. have their registered seats in Poland. The vast majority of employees at both companies (96%) are also based in Poland.

Employment and environmental indicators

Employment and environmental indicators are provided for CD PROJEKT S.A. and GOG sp. z o.o. – the Group’s two largest companies, as measured by the scale of their activities, employment, assets and revenues. For the purposes of this report the term “CD PROJEKT Group” is understood as both these companies combined.

Other indicators

Given that at the end of 2023 CD PROJEKT S.A., which is the holding company of the CD PROJEKT Group, accounted for 87% of the Group’s employees, 84% of its sales revenues and 96% of its balance sheet total for 2023, subsequent sections of this report describe management of ESG issues mainly from the point of view of the holding company (which is variously referred to as “CD PROJEKT” and “the Company”) unless indicated otherwise in the given disclosure.



Changes in reporting and external verification

[GRI 2-4, 2-5]

In the scope of our preparations for implementation of the CSRD² directive which entails compliance with ESRS³ standards, in 2023 we performed an assessment of the materiality of ESG issues for the CD PROJEKT Group based on the double materiality principle. The resulting materiality matrix enabled us to revise the list of GRI disclosures, which was originally based on the materiality assessment performed in 2021.

[Find out more](#) about our materiality assessment.



As we prepare for introduction of ESRS standards, the next milestone will be to expand the scope of reporting to include full numerical disclosures concerning CD PROJEKT S.A. and GOG sp. z o.o. For this reason some of the data presented in our 2023 Report is not directly comparable to disclosures provided in the preceding years, particularly in the scope of employment.

In the course of refining our carbon footprint calculation model, we recalculated the CD PROJEKT Group’s Scope 1, 2 and 3 emissions, and adjusted the values reported under GRI 305-1, 305-2, 305-3, 305-4 for the preceding years. Our new model for these calculations is described in the subsection titled “Carbon footprint”.

The CD PROJEKT Group Sustainability Report for 2023 was subjected to independent attestation, covering profile indicators as well as selected material result indicators marked (“*”) in the GRI table. This attestation service was provided by Deloitte Assurance Polska spółka z ograniczoną odpowiedzialnością sp. k. (formerly: Deloitte Assurance sp. z o.o.). The attestation report will be posted at [our website](#).

Contact information

[GRI 2-3]

Coordination and preparation of the CD PROJEKT Group Sustainability Report for 2023 is the responsibility of the ESG Team, which is part of the Investor Relations Department.



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IR & ESG Manager



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ESG Expert

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² Directive 2022/2464 of 14 December 2022 as regards corporate sustainability reporting (Corporate Sustainability Reporting Directive; CSRD)
³ European Sustainability Reporting Standards



02

OUR BUSINESS





About the CD PROJEKT Group

[GRI 2-1, 2-6]

As the CD PROJEKT Group we have been active on the dynamically growing global electronic entertainment market⁴ for nearly thirty years.

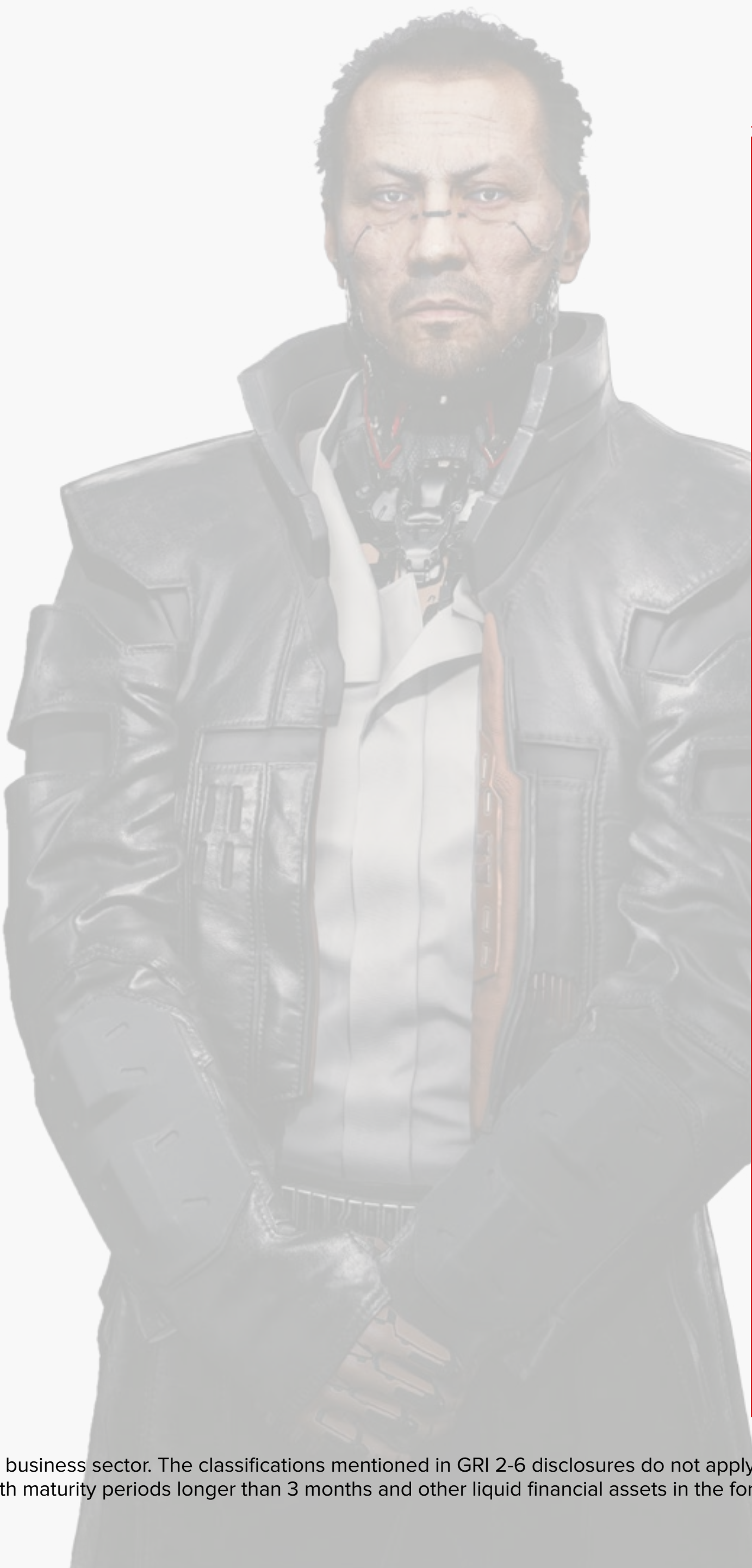
Find out more about [key moments](#) in the CD PROJEKT Group’s history.



We carry out our operations in two key business segments – CD PROJEKT RED and GOG.COM.

CD PROJEKT RED accounts for the bulk of the CD PROJEKT Group’s activities – namely, developing and publishing videogames and other tie-in products based on our brands: The Witcher and Cyberpunk.

GOG.COM covers digital distribution of videogames via the proprietary online distribution platform named GOG.COM and the GOG GALAXY application.



CD PROJEKT Group – highlights of 2023

1 230 milion PLN
in consolidated sales revenues

481 milion PLN
in consolidated net profit

1 309 milion PLN
in financial reserves⁵ at the end of 2023

1 168
employees from 45 countries

63%
developers in our team

31%
women in our team

97%
of our sales are exports

⁴ “Electronic entertainment market” is the best description of our primary business sector. The classifications mentioned in GRI 2-6 disclosures do not apply to member companies of our Group.
⁵ Financial reserves comprise cash on hand, near-cash, bank deposits with maturity periods longer than 3 months and other liquid financial assets in the form of treasury bonds (jointly aggregated with short- and long-term Other financial assets).

CD PROJEKT S.A. and the CD PROJEKT RED Studio

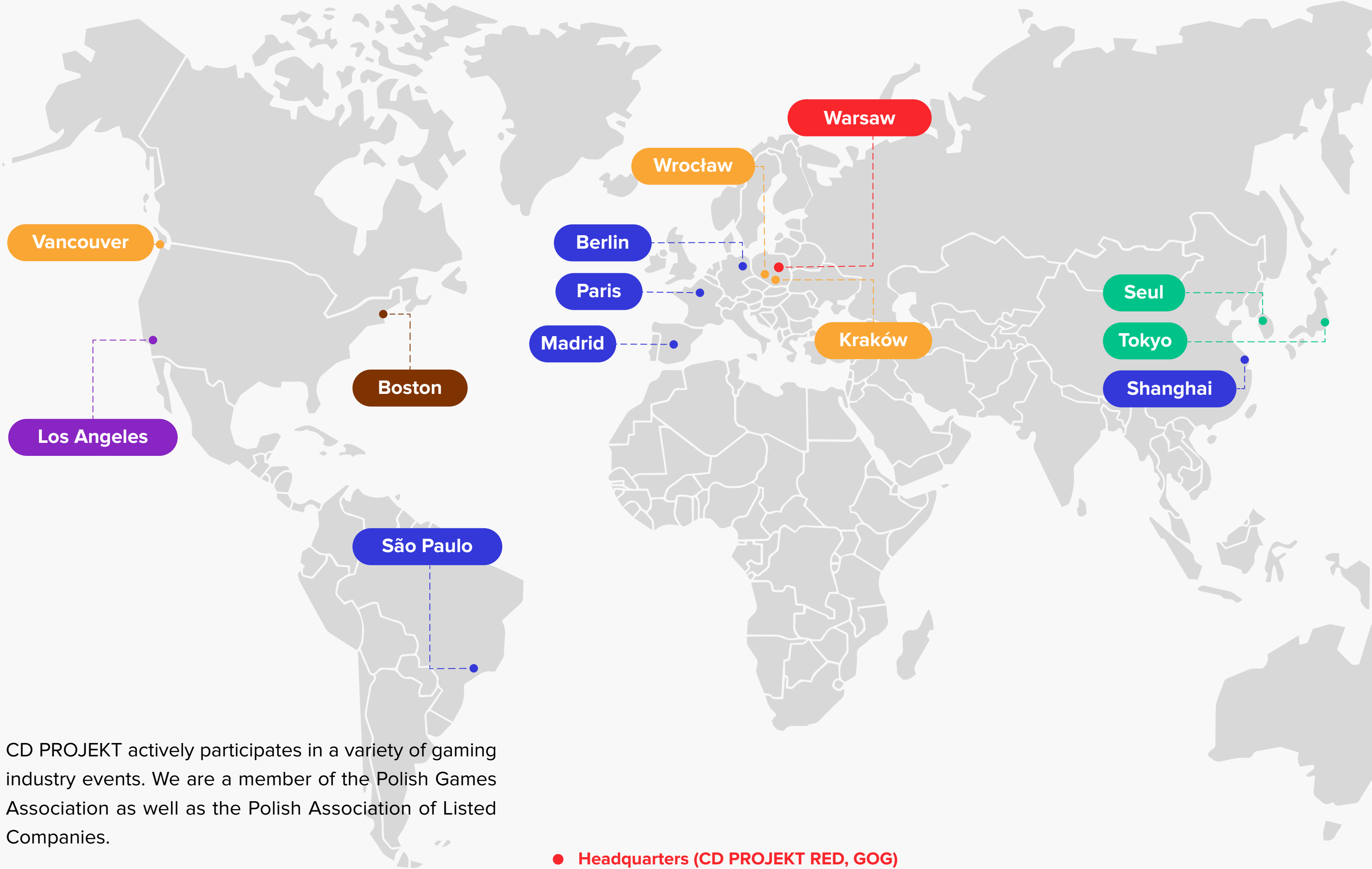
[GRI 2-1, 2-6, 2-28]

CD PROJEKT S.A. (“CD PROJEKT”, “the Company”) is the parent company of the CD PROJEKT Group. In 2023 it accounted for 84% of the Group’s consolidated sales revenues, and 99% of its consolidated net profit. Over a period of thirty years, activities carried out under the CD PROJEKT brand evolved from distribution of games in Poland and later throughout Central-Eastern Europe into full-fledged development of new games, global distribution and franchise management – all within the framework of the CD PROJEKT RED studio.

Our main products include three games from The Witcher series, including the last part of the trilogy – The Witcher 3: Wild Hunt, with its two storyline expansions: Hearts of Stone and Blood and Wine – along with Cyberpunk 2077 and its Phantom Liberty expansion, released on 26 September 2023. In addition to developing games, we continue to explore new business segments, build strong communities around our franchises and work to generate synergies between our products.

To further develop and strengthen our franchises, we also invest in tie-in products dedicated to fans of our games: among others, we offer comic books, board games, posters, music albums, apparel and other collectible gadgets.

Our corporate HQ is located in Warsaw⁶, Poland. For years we have been progressively expanding our development teams, employing videogame specialists from all around the world.



CD PROJEKT actively participates in a variety of gaming industry events. We are a member of the Polish Games Association as well as the Polish Association of Listed Companies.

Since 2010 CD PROJEKT has been listed on the Warsaw Stock Exchange. In 2018 the Company also became part of the WIG20 index, which aggregates the largest and most liquid stocks traded on the Warsaw market.

⁶ Both CD PROJEKT S.A. and GOG sp. z o.o. have their registered seats in Poland. The vast majority of employees at both companies (96%) are also based in Poland.

Our values



Be ambitious



Set the goal and persevere



Be honest with everyone at all times



Be kind and respectful to all around you



Always remember about the gamers



How we create value for stakeholders

[GRI 2-6]

OUR KEY CAPITAL

HUMAN CAPITAL

Team of experienced developers, highly skilled in creating and producing games, centered around a shared set of values

Internal publishing team with experience in leading global marketing campaigns, successfully promoting sales of our games

Effective backoffice team supporting our operations

INTELLECTUAL CAPITAL

Franchise rights: The Witcher and Cyberpunk, in selected fields of exploitation

TECHNOLOGICAL CAPITAL

Gamedev technologies and tools

RELATIONS AND SOCIAL CAPITAL

Strong communities established around our products

Longstanding trust-based relations with business partners

PRODUCT CAPITAL

Portfolio of available games and tie-in products

FINANCIAL CAPITAL

Financial reserves



STAKEHOLDER VALUE⁷

Presenting gamers with ambitious, innovative, high-quality games

Parallel development projects supporting an ambitious release schedule

Offering unique development opportunities and career advancement options for team members while retaining creative autonomy

Development and expansion of franchises by creating synergies and supporting recognition of our brands beyond the field of videogames

Steady stream of revenues and earnings - enabling financial independence

⁷ In the context of the presented chart, value is considered with regard to employees, gamers and investors. Stakeholders of the CD PROJEKT Group are further described in the section titled “Our approach to sustainable development”.

**We create revolutionary role-playing
games with memorable stories that
inspire gamers**

Our business strategy

[GRI 2-6]

In October 2022 we announced an update of the CD PROJEKT Group strategy and revealed long-term plans concerning our future releases. We intend to remain independent as a company. We believe that operational, financial and publishing autonomy enables us to achieve our ambitions and implement our creative vision.

Watch a [video presentation](#) of the main points of the CD PROJEKT Group strategy update.



In future years we expect that the Group’s strategic growth will follow the following main vectors:

- further upscaling of our development capabilities to be able to deliver more top-quality content to gamers;
- enhancing the recognition and popularity of our franchises (including in collaboration with external partners);
- adding multiplayer content to selected titles in the framework of our franchises.

An important aspect of our long-term business development is the establishment of the CD PROJEKT RED team in Boston, USA. The Boston team together with the existing CD PROJEKT RED Vancouver team is responsible for the Orion project, which is another game set in the Cyberpunk universe. For its part, CD PROJEKT RED dev teams operating in Warsaw, Kraków and Wrocław, focus

on the new Witcher-themed videogame trilogy, starting with the first game codenamed Polaris. The European teams are also responsible for developing the studio’s third franchise (within the project codenamed Hadar).

CD PROJEKT operates in a dynamic business environment, affected, among others, by evolving expectations and preferences on the part of gamers, political and macroeconomic uncertainties in Poland and throughout the world, as well as ongoing technological progress. To effectively implement our long-term strategic plans, we need to remain aware of the opinions voiced by gamers and the broad community of stakeholders.

Our activities involve ESG (Environmental, Social and Governance) aspects. In our business strategy, formally adopted by the Board in 2022, we list five ESG ambitions which shape our approach to responsible business development. Further sections of this report will describe the tools and activities used to achieve each of these ambitions.

To learn more about our approach to ESG, watch our [video presentation](#).



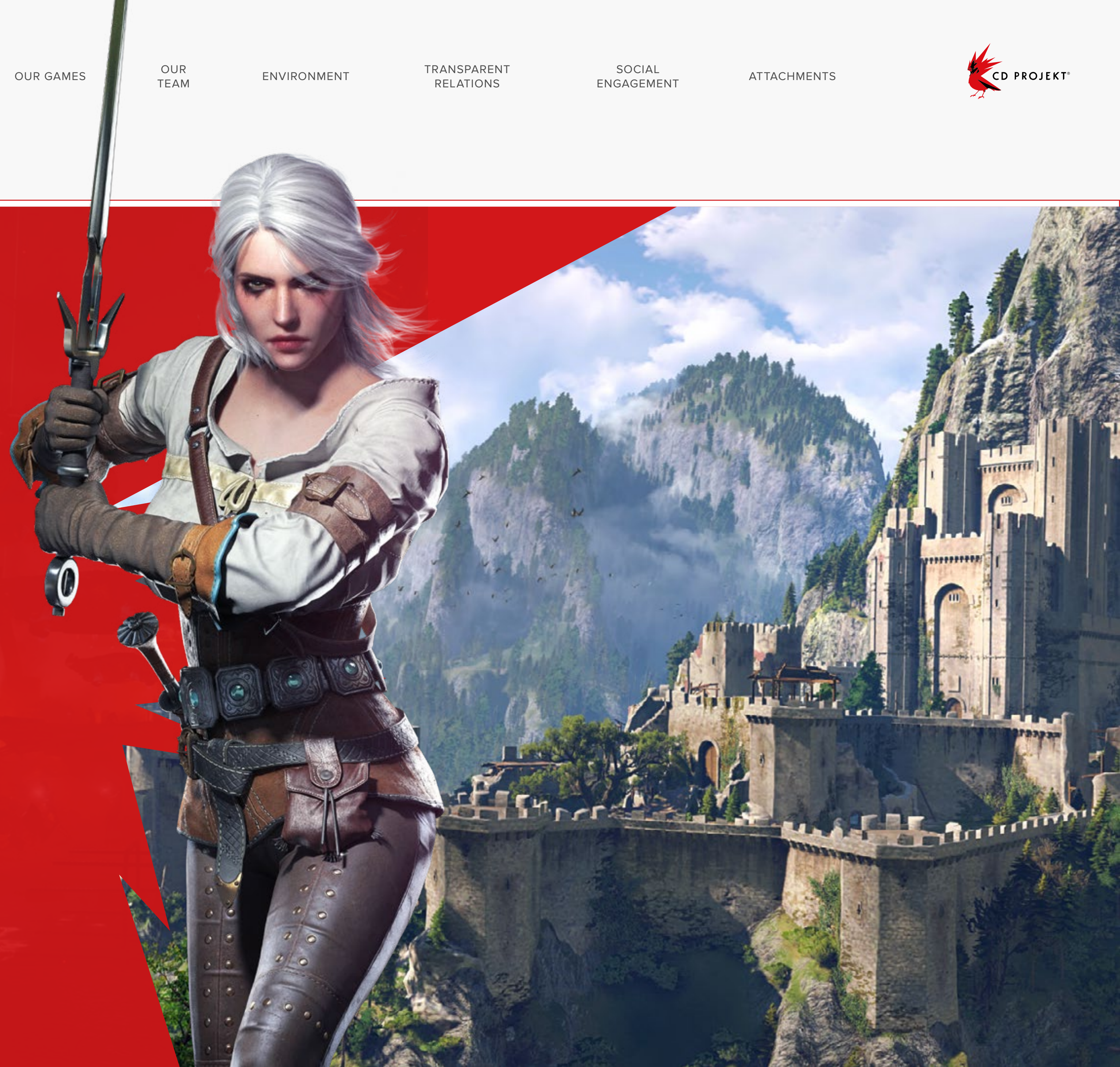
We also intend to publish, on an annual basis, our short- and long-term ESG goals, which will drive implementation of our business objectives in the years to come.

ESG Ambitions

- **Provoke reflection through the memorable stories**
- **Be a company people want to be a part of**
- **Continue the green transformation on our campus and beyond**
- **Build relationships based on trust and transparency**
- **Use our resources and competencies to support others**

03

CORPORATE GOVERNANCE





Structure of the CD PROJEKT Group

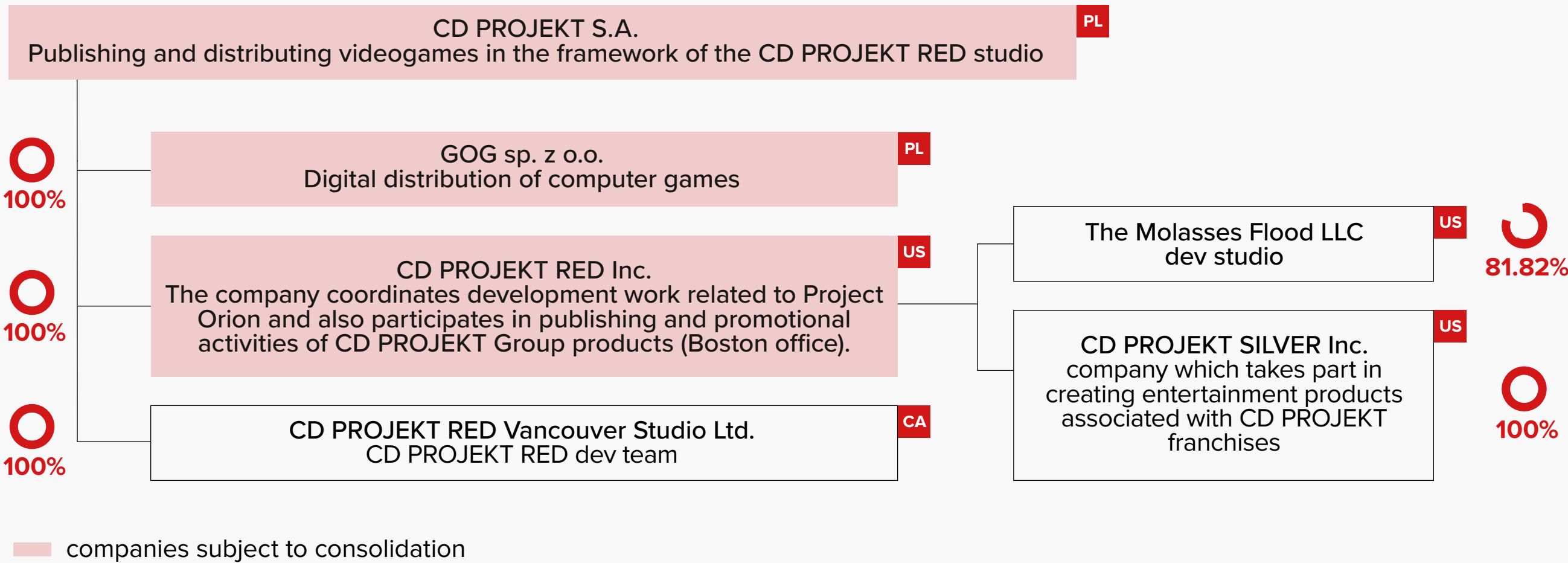
[GRI 2-6]

At the end of 2023 the CD PROJEKT Group consisted of the parent entity – CD PROJEKT S.A. – and five subsidiaries. Two mergers were registered in 2023, both involving takeover of subsidiaries – CD PROJEKT RED STORE sp. z o.o. and Spokko sp. z o.o. – by CD PROJEKT S.A. (the acquirer)⁸.

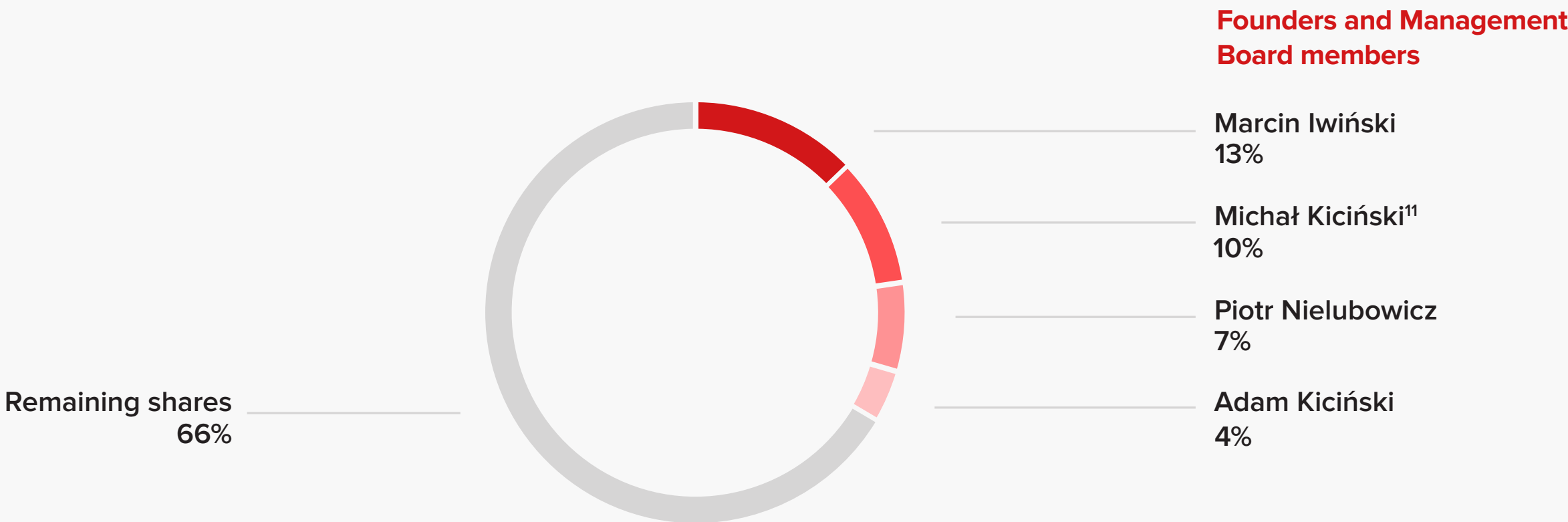
Share capital and shareholding structurea

The share capital of CD PROJEKT consists of 99 910 510 bearer shares, with each share affording one vote at the General Meeting⁹.

Structure of the CD PROJEKT Group as of 28 March 2024



Company shareholding structure as of 28 March 2024¹⁰



⁸ We have no minority shares in other companies, there were no disposals of such shares in 2023, and there were no mergers and acquisitions other than those described above.

⁹ According to §25a and b of the CD PROJEKT S.A. Articles of Association, the voting rights of each shareholder of the Company are limited among others in such a way that no shareholder may exercise more than 20% of votes from all Company shares outstanding as of the date of the General Meeting. This restriction does not apply to entities which jointly control at least 50% of all votes as a result of a public tender offer for all outstanding shares of the Company.

¹⁰ Structure is updated on the basis of formal notifications from shareholders holding at least 5% of the total number of votes at the General Meeting of the Company.

¹¹ According to the last [statement](#) made to the Company - on 13 November 2023.

Governing bodies of CD PROJEKT

[GRI 2-9, 2-11]

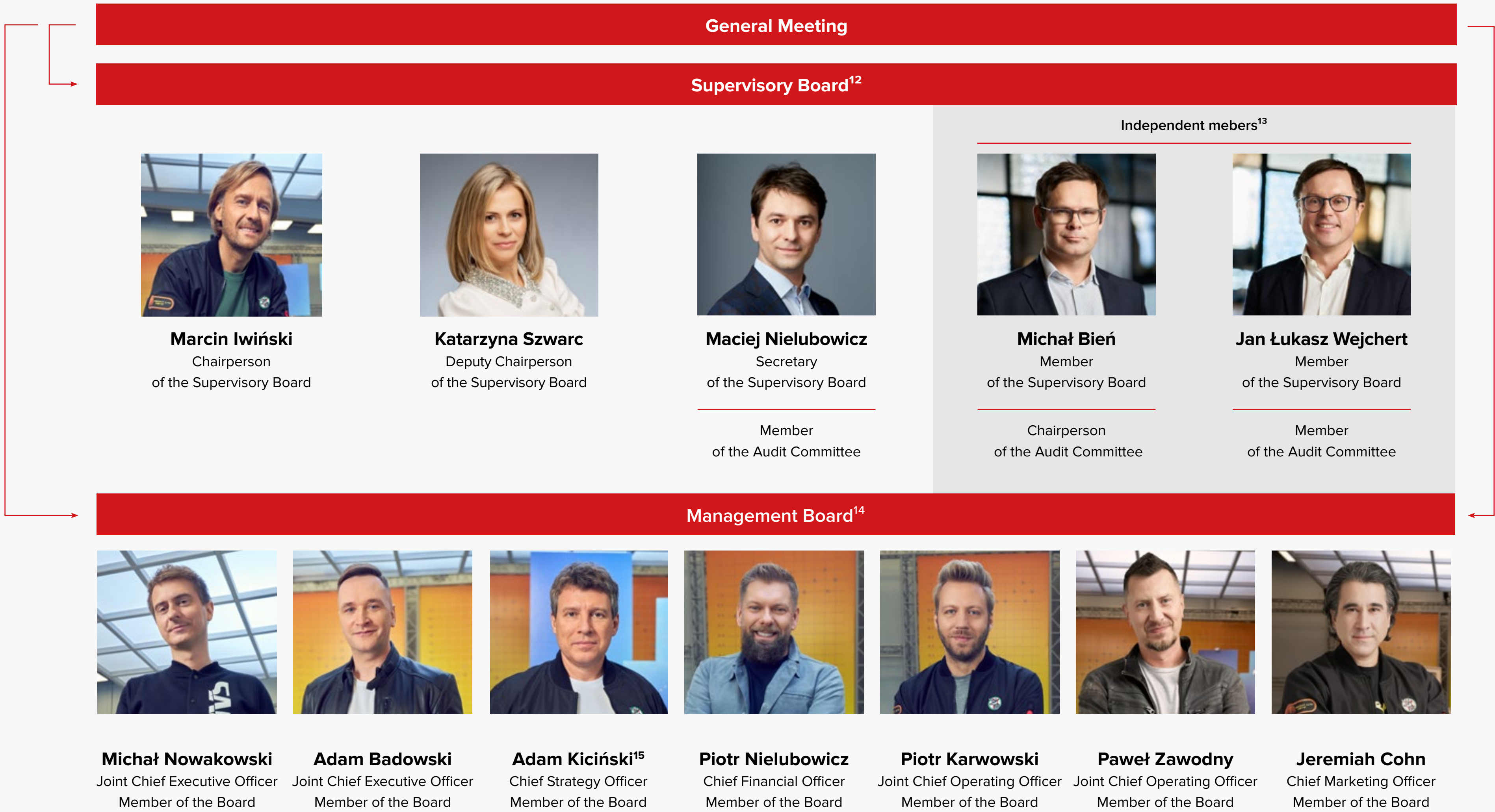
CD PROJEKT is governed by the following corporate bodies: General Meeting, Supervisory Board and Management Board. A single standing committee – the Audit Committee – exists within the organizational structure of the Supervisory Board.

The division of responsibilities among Company bodies does not diverge from basic principles adopted by other joint stock companies traded on the Polish market. As such, members of the Management Board are regarded as executives, while members of the Supervisory Board are regarded as non-executives.

We strive to ensure that the activities of official bodies of CD PROJEKT remain consistent with [Best practices for WSE listed companies 2021.](#)



Governing bodies of CD PROJEKT S.A. in 2023 and as of 28 March 2024



¹² No member of the Supervisory Board performs executive duties at the Company or any of its subsidiaries [GRI 2-11].

¹³ Pursuant to independence criteria specified in Art. 129 section 3 of the Act of 11 May 2017 on licensed auditors, audit firms and public supervision.

¹⁴ According to [Current Report 39/2023](#), the Management Board of the Company has decided that, effective on 1 January 2024, the assignment of responsibilities concerning individual areas of the Company's business operations to respective members of the Management Board would change, which also entails changes in the roles and official titles of Management Board members.

¹⁵ On 5 October 2023 Mr. Adam Kiciński notified the Company of his intent to seek appointment as Member of the Supervisory Board of CD PROJEKT S.A. starting in 2025, which also entails resignation from membership of the Management Board effective at the end of 2024 ([see Current Report 39/2023](#)).

Management Board of CD PROJEKT

The Management Board of CD PROJEKT acts in compliance with the Commercial Companies Code, [Company Articles](#) and [Management Board regulations](#).

Appointment of Management Board members [GRI 2-10]

Members of the Management Board are appointed and dismissed by the Supervisory Board of CD PROJEKT. Members of the Management Board are appointed to a joint four-year term of office. In line with current practices, key factors which determine appointment of members of the Management Board include professional experience, knowledge and educational background.

The current term of appointment of CD PROJEKT Board Members ends in 2025.

Powers of the Management Board

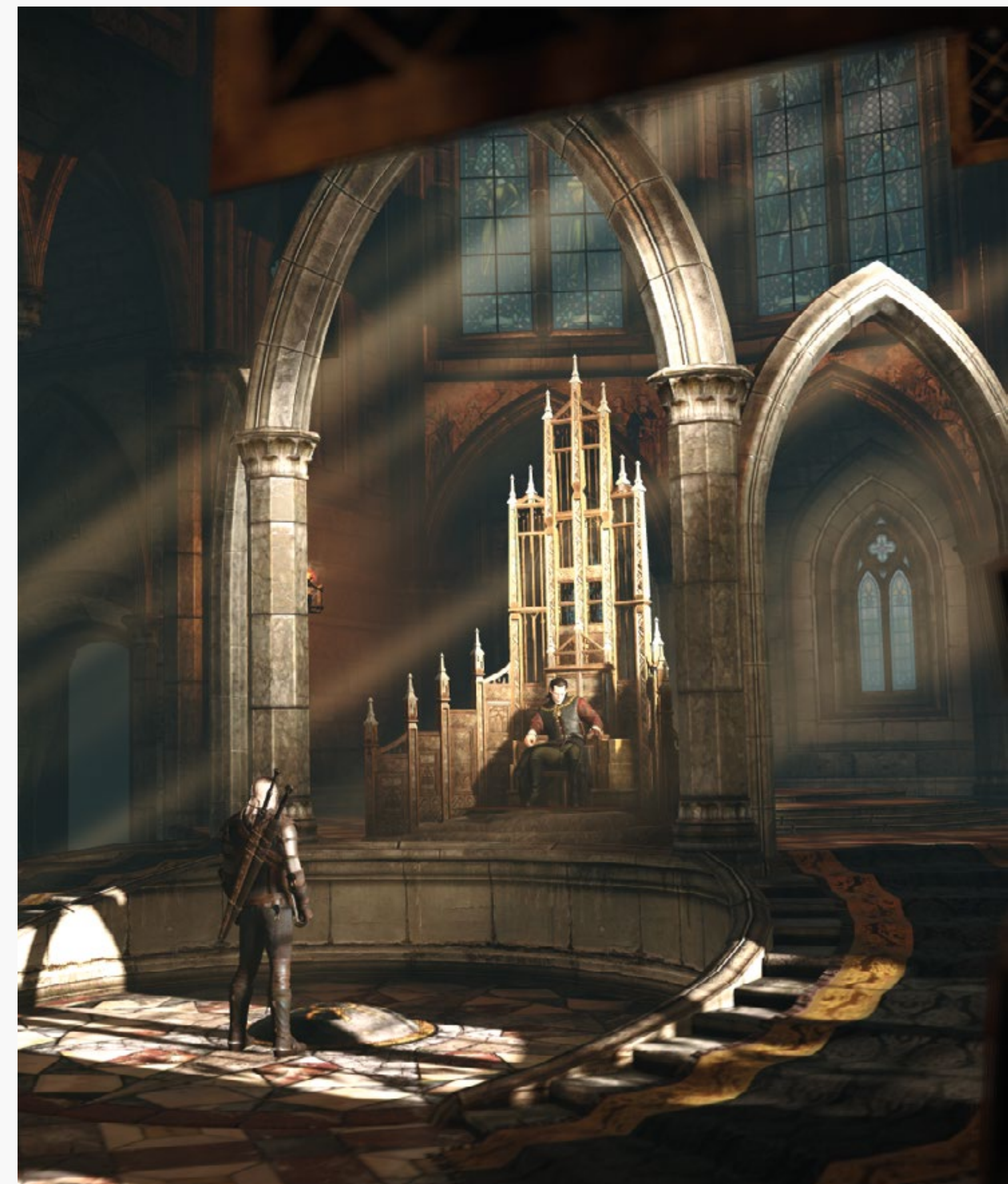
The Management Board handles all Company matters which are not reserved to the General Meeting or the Supervisory Board by the Commercial Companies Code or Company Articles.

Among others, the Management Board of CD PROJEKT:

- sets forth the Group's business strategy, defines its main goals, prepares financial plans for the Company, and oversees implementation thereof so as to ensure that the adopted strategy, goals and financial plans are realized;
- works to ensure that Company management practices remain transparent, effective and consistent with legal regulations, best practices for WSE listed companies and generally accepted market standards.

Management Board regulations are adopted by an absolute majority of votes. In 2023 the Management Board adopted 39 resolutions.

See the [bios](#) of members of CD PROJEKT's Management Board (including any notable involvement in the work of governing bodies at other companies).





Division of responsibilities between Management Board members							
	Michał Nowakowski Member of the Board Joint CEO	Adam Badowski Member of the Board Joint CEO	Adam Kiciński Member of the Board CSO	Piotr Nielubowicz Member of the Board CFO	Piotr Karwowski Member of the Board Joint COO	Paweł Zawodny Member of the Board Joint COO	Jeremiah Cohn Member of the Board CMO
Tenure in CD PROJEKT Group	19	22	30	25	17	6	10
Responsibilities	Jointly-responsible for the Company’s long term vision, coordinates the Company’s activities and its management. In particular responsible for the Company’s business strategy and effective sales policy. Supports development of new product lines and manages the Company’s back catalog (franchise flywheel). Shapes long-term business relations with key partners. Represents company in relation with the investors.	Jointly-responsible for the Company’s long term vision, coordinating the Company’s activities and its management. In particular responsible for the Company’s creative vision, and for managing, developing and maintaining the Company’s creative teams. Develops and defines the unique image and style which distinguish the Company and its products on the market.	Responsible for the Company’s strategy and for its implementation.	Responsible for the Company’s financial strategy, and for financial and non-financial reporting and legal area. Oversees strategic corporate projects, key investments and Company’s climate and environmental policy.	Responsible for the Company’s game development processes and optimization of its operational capabilities, including in-house production, external games development and management of the Group’s studios. Additionally oversees development of online and user experience competencies.	Responsible for shaping the Company’s tech strategy and optimization of its operational capabilities. Plays a pivotal role in driving both the technological and organizational transformation of CD PROJEKT RED. Oversees the Company’s activities in the scope of employment, talent management and work methodology, ensuring they are aligned with the Company’s broader transformation objectives.	Responsible for the Company’s global marketing strategy, product communication and branding in support of franchise development. Oversees efforts to build recognition of the Company, its IP, and product releases by shaping engagement with fans and the community.

Supervisory Board of CD PROJEKT

The Supervisory Board acts in compliance with the Commercial Companies Code, [Company Articles](#) and [Supervisory Board Regulations](#).

Appointment of Supervisory Board members [GRI 2-10]

Members of the Supervisory Board of CD PROJEKT are appointed and dismissed by the General Meeting. Members of the Supervisory Board are appointed to a joint four-year term of office. The Supervisory Boards appoints its own Chairperson, Deputy Chairperson and Secretary from among its members.

The current term of office of the CD PROJEKT Supervisory Board expires in 2025.

Supervisory Board members submit declarations attesting to their independence¹⁶ and the lack of any factual and material links with shareholders who control at least 5% of the total number of votes at the Company. As of the publication date of this report, two members of the Supervisory Board (Michał Bień and Jan Łukasz Wejchert) meet the independence criterion.

See the [bios](#) of members of CD PROJEKT’s Supervisory Board (including any notable involvement in the work of governing bodies at other companies).



Powers of the Supervisory Board

Among others, the Supervisory Board of CD PROJEKT S.A.:

- supervises all areas of activity at the Company;
- contracts licensed auditors to perform audits of the Company’s annual financial statements and reviews of its semiannual financial statements;
- endorses petitions submitted by the Management Board to the General Meeting;
- authorizes the Management Board to buy and sell properties, shares in properties, or perpetual usufruct thereof;
- prepares reports on remuneration of Members of the Management Board and Supervisory Board, as well as activity reports which contain a concise assessment of the Company’s condition – including its internal control system, risk management and compliance.

Audit Committee

Activities of the Audit Committee are regulated by the [CD PROJEKT S.A. Audit Committee Regulations](#) along with the applicable legal regulations. The Audit Committee consists of at least three persons, including the Chairperson, appointed in an open ballot by the Supervisory Board from among its own members. The term of office of the Audit Committee is consistent with that of the Supervisory Board itself. Chairmanship of the Audit Committee is held by a member of the Supervisory Board who meets independence criteria and is not the Chairperson of the Supervisory Board. At least one member of the Audit Committee should possess knowledge and skills in the scope of accounting or auditing financial statements.



¹⁶ These refer to independence criteria defined in Art. 129 section 3 of the Act of 11 May 2017 on licensed auditors, audit firms and public supervision.



General Meeting of CD PROJEKT

The General Meeting of CD PROJEKT acts in compliance with the [Company Articles](#), [General Meeting Regulations](#) and applicable legal regulations, including the Commercial Companies Code. Shareholders exercise their rights as defined in the [Company Articles](#), [General Meeting Regulations](#) and applicable legal regulations.

Powers of the General Meeting

General Meeting approval is required for all decisions regarded as crucial for the Company. Powers of this body include:

- approving financial statements and the Management Board’s activity reports;
- granting discharge on the performance of duties to the Company’s Management Board and Supervisory Board;
- adopting a resolution on the allocation of profit or coverage of the Company’s losses;
- appointing and dismissing Members of the Supervisory Board;
- amending the Company’s Articles of Association;
- changing the Company’s share capital.

Among other matters, the General Meeting of CD PROJEKT S.A. is also responsible for setting the remuneration of Supervisory Board members¹⁷.

A General Meeting is held at least once per financial year.

General Meeting resolutions are adopted by a 60% majority of votes cast, with the exception of matters where the applicable regulations require a higher supermajority of votes.

Conflict of interest

[GRI 2-15]

Rules to be observed in relation to a conflict of interest are determined by the Company’s internal regulations and the Commercial Companies Code.

According to the [Management Board Regulations](#), Members of the Management Board should notify the Supervisory Board whenever a conflict of interest has arisen or may arise in connection with their duties.

A Management Board member may not, without express approval of the Supervisory Board:

- be a member of any governing body of an entity which is not part of the Company’s Group;
- engage in competition with the Company;
- be a partner in a civil law partnership or sit on an official body of a limited company which engages in competition with the Company;
- be a member of an official body of any other legal entity which engages in competition with the Company;
- hold at least 10% of shares or stock of a competing company, or be empowered to appoint at least one member of the management board of a competing company.

If a conflict of interest arises between the Company and a Member of its Management Board, their spouse or relative up to the second degree of kinship, or a person with whom the member of the Management Board has a personal relationship, the affected member should declare that a conflict of interest has arisen and recuse themselves from making any decisions in the relevant matter. They may also demand that a corresponding note be included in the meeting minutes.

According to [Supervisory Board Regulations](#) in circumstances when the adoption or non-adoption of a Supervisory Board resolution would trigger a conflict of interest involving a Member of the Supervisory Board, the affected Member should notify the Supervisory Board and recuse themselves from further discussion and voting on the resolution. A corresponding note is also included in the Supervisory Board meeting minutes.

Thus far the Company has not encountered a situation where a conflict of interest would arise with respect to a Member of the Management Board or Supervisory Board.

¹⁷ With the exception of setting the remuneration of a Supervisory Board member delegated to perform the duties of a Management Board member in temporary capacity, which is instead handled by the Supervisory Board.

Diversity on the governing bodies of CD PROJEKT

[GRI 405-1]

In line with the Company's [Diversity Policy](#), a general non-discrimination principle applies to teams and bodies of CD PROJEKT, and consequently also to members of the Management Board and Supervisory Board, as well as other top managers.

The Company's policy with regard to its corporate bodies and other top managers is to appoint creative individuals who have the required competences, professional experience and educational background. Members of the Management Board and Supervisory Board possess expertise in areas such as management and marketing, finance, law and IT.

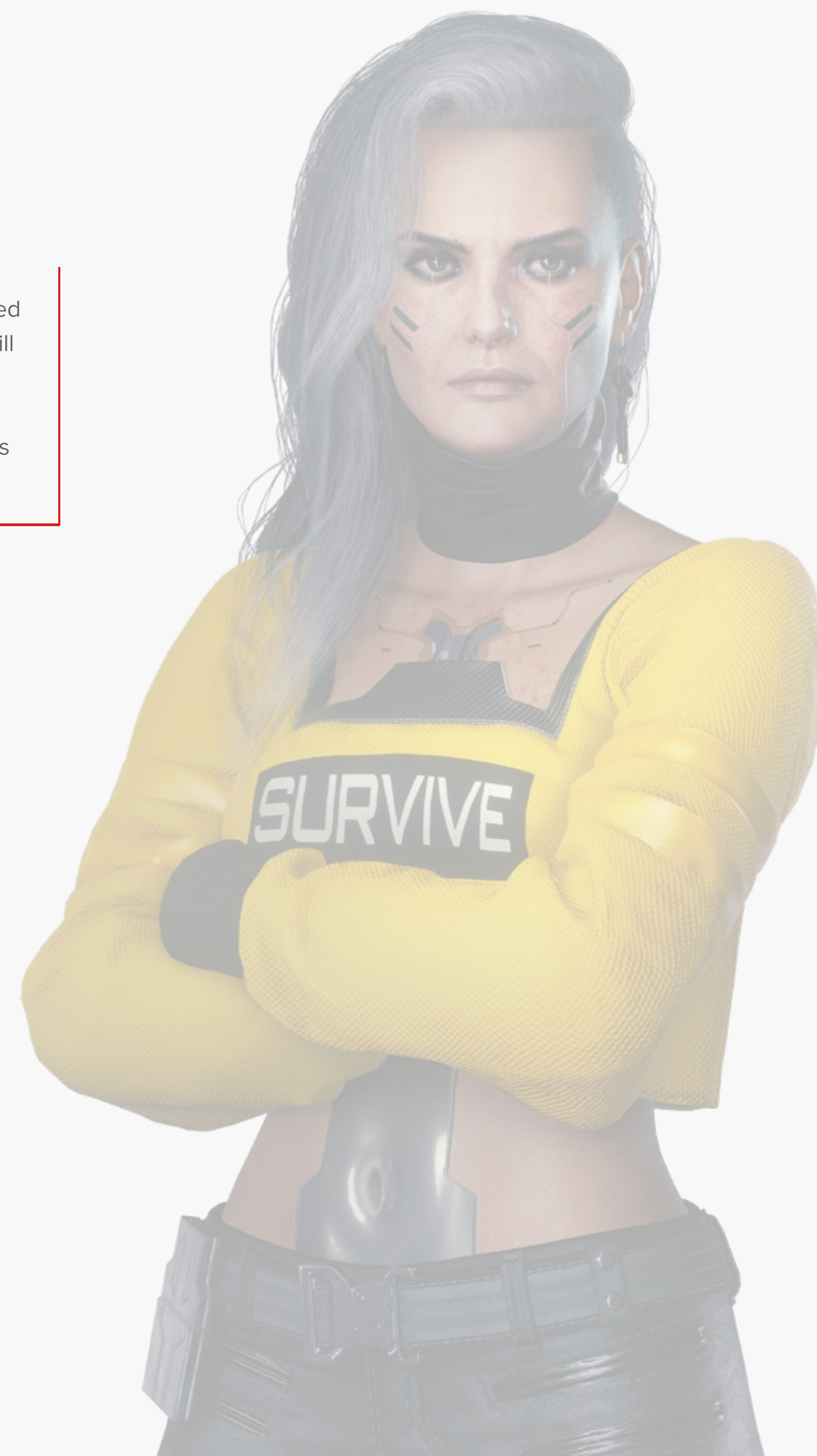
All Members of the Management Board of CD PROJEKT have longstanding experience as holders of managerial positions at CD PROJEKT Group member companies.

Company activities related to improving gender balance on governing bodies will be taken in accordance with the applicable regulations, and will acknowledge the opinions of Members of the Supervisory Board or shareholders who exercise their voting rights at the General Meeting and are empowered to appoint Members of the Management Board and the Supervisory Board respectively.

In 2023 the Management Board of CD PROJEKT consisted solely of men, whereas the Supervisory Board included one woman, who was also its Deputy Chairperson during the reporting period.

¹⁸ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022L2381&from=EN>

Given the provisions of Directive (EU) 2022/2381 of the European Parliament and of the Council on improving the gender balance among directors of listed companies and related measures¹⁸, as well as the regulations which will be transposed to the Polish legal order in association therewith, CD PROJEKT will strive to take action to improve gender balance on its governing bodies.



Remuneration policy for members of the Management Board and Supervisory Board

[GRI 2-19, 2-20]

The CD PROJEKT [Remuneration Policy](#) regulates the remuneration of Members of the Company’s Management Board and Supervisory Board, and is part of the overall employment and compensation policy at the Group. In order to avoid conflicts of interest related to the Remuneration Policy, responsibility for adopting, enforcing and verifying the Remuneration Policy is divided among various governing bodies of the Company.

The Remuneration Policy is adopted by the General Meeting at least once every four years. The Supervisory Board develops elements of the Remuneration Policy on the basis of a suitable authorization issued by the General Meeting, and prepares recommendations concerning the Policy’s effectiveness. The Management Board is charged with enforcing the Remuneration Policy and preparing the relevant documentation, as well as providing the Supervisory Board with information required in the process of verifying and applying the Policy.

The overall aim of the Remuneration Policy is to create favorable conditions for recruitment, retention and incentivization of persons who possess competences and experience required to ensure the Group’s further dynamic growth.

The Remuneration Policy applicable to members of the Management Board and Supervisory Board of the Company was submitted to a vote at the General Meeting on

28 July 2020, and duly approved by shareholders with 69.4% of votes cast in favor of the corresponding resolution.

As authorized by the General Meeting, on 27 August 2020 the Supervisory Board of CD PROJEKT announced detailed provisions regarding specific elements of the Remuneration Policy, among them – descriptions of components of variable remuneration, criteria and deferment periods applicable to variable remuneration as well as non-monetary benefits which may be assigned to members of the Management Board as part of their fixed compensation packages.

The remuneration of a Management Board member includes a fixed portion, i.e. a base salary which is assigned on an individual basis by the Supervisory Board, pursuant to the Remuneration Policy and consistent with the scope of responsibilities of the given Management Board member. Members of the Management Board may additionally be assigned variable remuneration, which is dependent on meeting certain objectives related to the Company’s business performance – financial and otherwise. A clawback clause applies if variable remuneration is assigned on the basis of erroneous information obtained from the Management Board Member in the context of meeting the aforementioned objectives, or if it is assigned in breach of the applicable provisions of the Remuneration Policy or conditions of assignment of variable remuneration.

The Supervisory Board may, by adopting a suitable resolution, assign a bonus to a specific member of the Management Board for performing a certain task – such as effective management of environmental issues, ensuring observance of the Company’s social responsibility commitments, overseeing corporate governance practices at the Company,

or accomplishing other managerial objectives as defined by the Supervisory Board.

Members of the Management Board of CD PROJEKT also participate in Incentive Program B for the years 2023-2027 instituted on the basis of an Extraordinary General Meeting resolution adopted on 18 April 2023.

[Click here](#) to find out more about Incentive Programs A and B in force at CD PROJEKT during the 2023-2027 period.



Members of the Supervisory Board obtain only fixed remuneration in the form of cash payments which are not dependent on any performance indicators and are not tied to the Company’s earnings. Remuneration of Supervisory Board members is assigned on the basis of General Meeting resolutions and must comply with the provisions of the Remuneration Policy in force at the Company.

The Company does not assign to Members of its Management Board and Supervisory Board any individual remuneration in the framework of retirement and pension programs, early retirement programs, welcome bonuses or – with regard to candidates for appointment to the aforementioned bodies – monetary incentives to seek such appointment.

Detailed information regarding the remuneration of members of the Management Board and Supervisory Board of CD PROJEKT can be found in the Management Board report on CD PROJEKT Group activities in 2023, which is available on [the Company website](#).



Managing sustainability at CD PROJEKT

[GRI 2-12, 2-13, 2-14, 2-17, 2-18]

At CD PROJEKT S.A. supervision of ESG reporting is the responsibility of the CFO, Member of the Board. The CFO participates in preparing the Report and reviews the ESG disclosures contained within.

Setting and overseeing implementation of specific goals related to ESG is the responsibility of Management Board members tasked with supervising specific areas of the Company’s activity. At CD PROJEKT, ESG matters fall within the scope of activity of numerous teams and departments, including HR, payroll, internal communication, diversity and inclusion, administration (incl. environmental issues), IT, operations, legal (incl. matters related to compliance, IP and corporate law), taxation, community, PR and others. In 2023 the Management Board appointed an ESG Management Group, to whose members it delegated managing issues which fall within their respective scopes of responsibilities. The Group comprises individuals whose responsibilities include ESG matters and who are positioned as Vice Presidents (“VP”) or Directors at the Company. The Group’s work is organized by members of the ESG Team, who also coordinate the ESG reporting process at CD PROJEKT and its Group, and oversee implementation of sustainability strategies.

No formal evaluation of the Company Management Board’s performance in the scope of supervising and managing CD PROJEKT’s effect on environmental, social and economic issues was carried out in 2023.



BEST PRACTICE



In 2023 we launched a series of meetings between Board members and experts in matters related to sustainability in the gamedev industry – titled “ESG Inspiring Talks”. Two such meetings were held last year: the first one dedicated to diversity and representation in games; the second one to the effect the gamedev industry has on climate change.

Managing sustainability-related risks

A Risk Management Procedure is in force at CD PROJEKT, specifying how to identify, assess and monitor risks (including threats and opportunities). In 2023 the Procedure was updated with a range of enhancements, including a new risk monitoring system based on the concept of Key Risk Indicators (KRI).

The risk management process at CD PROJEKT involves Risk Owners, i.e. top managers or executives charged with coordinating specific areas of the Company's activity, along with Risk Custodians charged with daily management of specific risks.

Risk management at member companies of the CD PROJEKT Group is the responsibility of their respective Management Boards. The internal audit and risk management system at CD PROJEKT S.A. is supervised by the Audit Committee.

Further information concerning risk management, along with a description of risks regarded as material for the CD PROJEKT Group, can be found in the [Management Board report on CD PROJEKT Group activities in 2023](#).

The following ESG-related risks have been identified as material and are managed in accordance with the Risk Management Procedure.

Team-related risks:

- Risk associated with recruitment, retention and structuring of teams

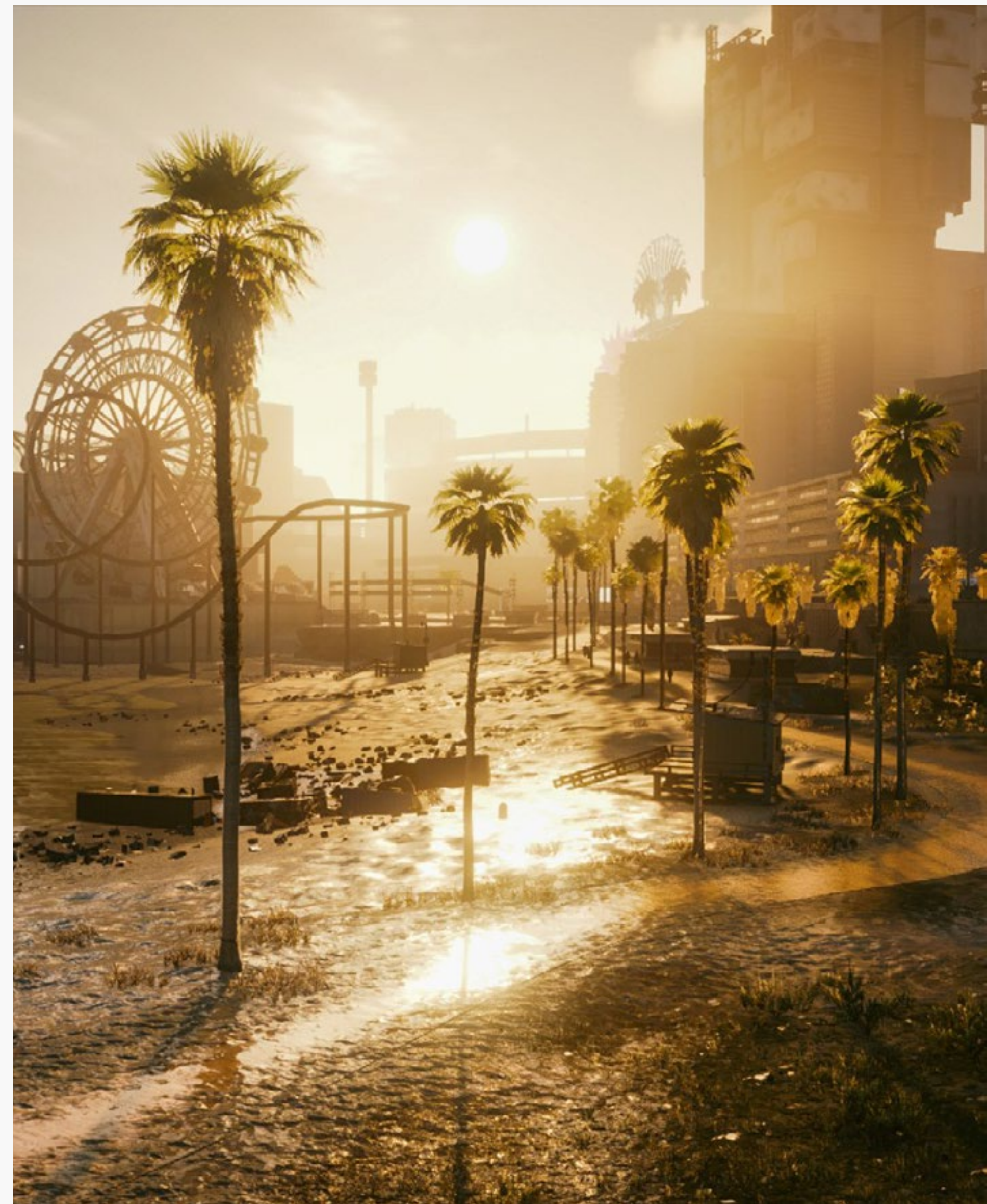
Environmental and climate-related risks:

- Risk related to protection of the natural environment and the climate

A detailed list of risks (threats and opportunities) related to climate change can be found in the Environment section.

Governance-related risks:

- Risk of unavailability of IT infrastructure or services, including cybersecurity risk
- Risk associated with regulatory compliance
- Risk associated with cooperation with key suppliers
- Risk associated with intellectual property rights



04

OUR APPROACH TO SUSTAINABLE DEVELOPMENT





CD PROJEKT Group stakeholders

[GRI 2-29]

We preceded our preparation of the CD PROJEKT Group Sustainability Report for 2023 by a review of key stakeholder groups, based on the Johnson and Scholes matrix which groups stakeholders by their expectations, level of involvement, and effect on the Group. Below we list the key groups of stakeholders with which we frequently interact. The overall aim of engagement is to ensure that stakeholders are kept up to date on the Company’s daily affairs, and also that they are able to share their opinions regarding our ongoing activities.

Key stakeholders	Type of engagement
External stakeholders	
Gamers and customers	Proactive and reactive communication with gamers – direct communication during trade fairs and live meetings with the community hosted by the Group and indirect interactions through social media and portals.
Capital market: <ul style="list-style-type: none">■ institutional and retail investors■ rating agency analysts, including ESG rating agencies■ sell-side analysts■ buy-side analysts■ representatives of capital market institutions and organizations	<p>We endorse transparency – we provide detailed and transparent information in the form of press releases, current reports and periodic reports regarding financial performance indicators and key operating and corporate events. We also engage in direct dialogue during meetings, conferences and conference calls, and also by responding to inquiries on an ongoing basis.</p> <p>We care about providing transparent information on our investor relations website. We organize and broadcast General Meetings of Shareholders at which we facilitate real-time remote voting. Each year we participate in over a dozen international conferences and roadshows dedicated to institutional investors, and in selected events targeting individual investors. We run a dedicated investor relations profile on Twitter: @CDPROJEKTRED_IR.</p> <p>Information regarding CD PROJEKT and its current activities is provided in two language versions – in Polish and in English.</p>
Business partners (suppliers and clients)	We maintain business relations through individual meetings, phone calls and e-mail discussions. Our agreements are based on fair standards of cooperation complying with the internal policies of both parties. In 2023 we enacted Fair Play. Code for Suppliers – a document which specifies rules governing our collaboration with suppliers.
Media: <ul style="list-style-type: none">■ gaming journalists■ finance and economic journalists■ web creators■ opinion leaders	Our PR, marketing and investor relations departments remain in constant contact with representatives of the media, internet creators and opinion leaders. Communication entails, among others: publishing current and periodic reports, distributing press releases, holding press conferences, actively communicating in social media and delegating Company representatives to take part in trade events, interviews and expert panels.
Internal stakeholders	
Team members	We stay in touch with our team members – among others via meetings, e-mail, surveys, opinion polls, periodic reviews and feedback collection. Team members can also use the Speak Up tool to submit reports of potential irregularities, either directly or using anonymous contact forms.



Assessing the materiality of ESG topics

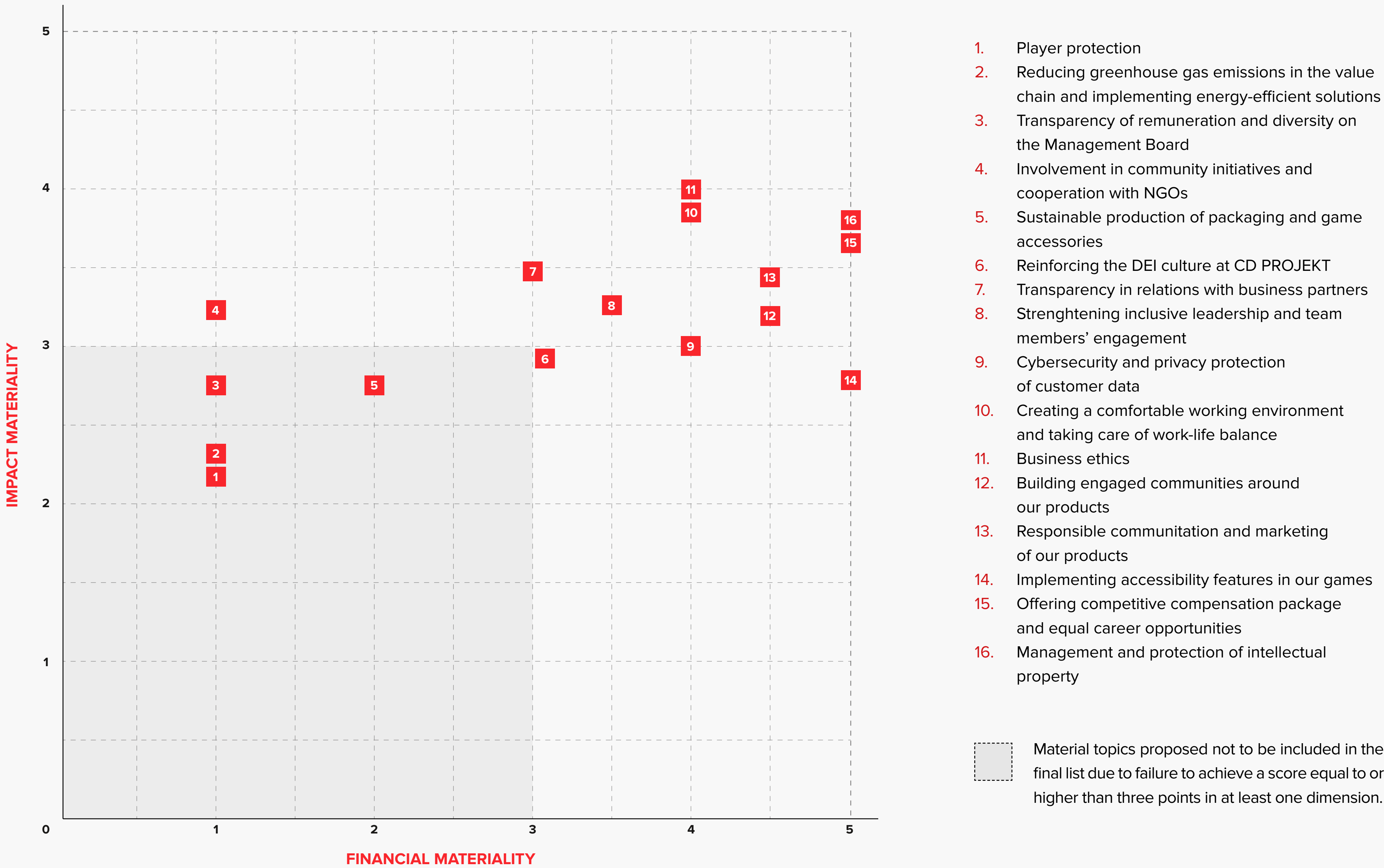
[GRI 3-1, 3-2, 3-3]

In 2023, as we prepared for implementation of the CSRD directive, we carried out an assessment of materiality of ESG topics based on the double materiality principle described in ESRS standards. This activity involved a broad group of stakeholders – both external and internal. The study ran from July to November 2023.

	Actions taken	Results
Diagnosis	Analysis of the CD PROJEKT Group value chain; benchmarking material ESG matters at gamedev companies throughout the world	Broad list of ESG issues which may potentially be regarded as material for the gamedev industry
Qualitative assessment	Workshop involving external experts (industry representatives, journalists, investors)	List of ESG issues potentially material for the CD PROJEKT Group narrowed down to 16 items
Quantitative assessment	Surveys involving team members and gamers – assessing the impact of potentially material ESG issues (disruptiveness and irreversibility of effects)	Scoring of potentially significant ESG issues for CD PROJECT Group (significance of impact in the dimensions of severity and irreversibility of effects).
Workshop involving CFO and VP of Finance	Determining the financial materiality of potentially material ESG issues and assessing the scale of their impact	ESG issues potentially material for the CD PROJEKT Group scored with regard to their financial materiality and extent of impact
Analysis of results	Plotting potentially material ESG issues on a 2D grid (impact materiality and financial materiality)	ESG materiality matrix for the CD PROJEKT Group
Management Board approval of resulting list	Deciding on a “cutoff point” and approving the list of ESG issues regarded as material for the CD PROJEKT Group (by the CFO)	List of 12 ESG issues regarded as material for the CD PROJEKT Group

This study produced an ESG materiality matrix for the CD PROJEKT Group. Each issue was rated on the five-point Lickert scale, with aggregate results plotted on the matrix.

ESG materiality matrix for the CD PROJEKT Group



We decided to regard as material any issues which received at least 3 points on either axis. We also decided to elevate the materiality of the issue named “Reducing greenhouse gas emissions in the value chain and implementing energy-efficient solutions”. Even though our stakeholders did not assign much importance to this issue, we – much like any other commercial enterprise – exert an impact on our environment, which includes the natural environment and the climate. In light of this effect, and of our associated responsibilities, we added this issue to the final list. Moreover, we decided to merge “Reinforcing the Diversity, Equity and Inclusion (DEI) culture at CD PROJEKT” and “Strengthening inclusive leadership and team members’ engagement” into a single issue. We regard inclusive leadership as a prerequisite of a Diversity, Equity and Inclusion culture, and consider the level of involvement to be one of its measurable indicators.

List of material ESG issues

[GRI 3-2]

E	Pillar E – Environment
	<ul style="list-style-type: none">■ Reducing greenhouse gas emissions in the value chain and implementing energy-efficient solutions
S	Pillar S – Social
	<ul style="list-style-type: none">■ Strengthening the DEI culture at CD PROJEKT by, among others, fostering inclusive leadership■ Offering a competitive salary package and equal opportunities for advancement■ Ensuring comfort at work and taking care of work-life balance■ Building engaged communities around our products■ Implementing accessibility features in our games■ Responsible communication and marketing of products■ Involvement in community initiatives and cooperation with NGOs
G	Pillar G – Governance
	<ul style="list-style-type: none">■ Management and protection of intellectual property■ Business ethics■ Cybersecurity and data protection■ Transparency in relations with business partners

Compared to last year’s list of material ESG issues, the new list covers one additional topic: adding accessibility feature to our games¹⁹ (for individuals with special needs related e.g. to their disabilities, as well as language localizations). This reflects current industry trends regarding accessibility in games being published. As for the remaining topics – these follow up on issues reported in past years.

The list of 12 ESG issues regarded as material for the CD PROJEKT Group was approved by the CFO – Member of the Board responsible for ESG reporting – in November 2023. Opinions voiced by stakeholders in the materiality assessment process were conveyed to members of the ESG Management Group²⁰ and taken into account when setting goals for 2024 in the relevant areas.

OUR ESG RATINGS²¹

MSCI	S&P Global	Moody's	ISS ESG
A	31/100	31/100	C-
FTSE Russell	Refinitiv	Sustainalytics	CDP
2,8	47	15,9	C



¹⁹ The GRI standard does not encompass indicators which are specific to our industry – “Introducing accessibility features in our games” and “Management and protection of intellectual property” – hence, In the “Transparent relations” section we describe ways of handling these matters without referring to specific GRI indicators.

²⁰The structure and scope of responsibilities of the ESG Management Group are described in the section titled “Managing Sustainability at CD PROJEKT”.

²¹ As of the publication date of the CD PROJEKT Group Sustainability Report for 2023.



Summary of implementation of ESG goals for 2023

In our 2022 ESG report we set forth operational goals for the coming years. These goals are consistent with the UN 2030 Agenda for Sustainable Development. Below we provide a summary of the status of each goal (as of the publication date of this report).

Management and corporate governance	
2023: Improving the process of vetting business partner and publishing a Supplier Code of Conduct.	Achieved We published the Fair Play Code for Suppliers and adapted the feature set of our IT tools to enable verification of suppliers.
2023: Reinforcing awareness of ethical and legal issues at CD PROJEKT, among others by increasing the number of team members who have received whistleblower, anti-corruption and GDPR training.	Achieved Training statistics are presented in the “Business ethics” section.
Social aspects	
2025: Increasing the engagement score for CD PROJEKT employees to at least 75% (currently at 70%; measured using the Culture Amp coefficient).	Long-term goal Subject to ongoing work (72% reported in December 2023).
2023: Improving team diversity, among others by carrying out a survey of career development requirements and obstacles faced by female employees, and preparing recommendations based on its results.	Achieved The course of this survey is described in the “Diversity and inclusion” section.
Environmental aspects	
2023: Submitting to EMAS certification as the first gamedev company in Poland.	Achieved We successfully completed our EMAS certification in October 2023.
2023: Setting long-term emissions reduction goals in Scopes 1 and 2 for domestic member companies of the CD PROJEKT Group.	Achieved By 2030 we intend to reduce the CD PROJEKT Group’s Scope 1 and 2 emissions by 42% (compared to the 2023 baseline figures).
2023: Reducing our carbon footprint in Scope 2 by expanding the renewable energy infrastructure at CD PROJEKT’s Warsaw campus by at least 40% and modernizing our IT infrastructure.	Partly achieved We increased the generating potential of our solar energy infrastructure by 31.68 kWp (31.06% increase) and carried out planned upgrades to our IT infrastructure.

Analyzing the environmental, social and economic impact of the CD PROJEKT Group’s activities

[GRI 3-1, 3-3]

Having analyzed the environmental, social and economic impact of our activities, we formulated five ESG ambitions which were described in the CD PROJEKT Group’s business strategy update, adopted in 2022. Impact management is described in sections devoted to respective ambitions.

Ambition 1.

Provoke reflection through memorable stories

Potential impact		
Environmental	Social	Economic
No impact	Positive impact	No impact

We believe we can leave a strong mark on our world by creating games which broach important subjects, evoke emotions and lead gamers to reflect upon their choices. We want gamers to feel invested in the stories we tell – which is why we present them with ambiguous choices, showing that there are no easy answers in life and that the distinction between good and evil is often blurry. We try to populate our games with vivid characters representing diverse backgrounds, personality types and social classes. In The Witcher 3: Wild Hunt we address, among others, such issues as domestic violence, strained family relationships and discrimination. For its part, Cyberpunk 2077 focuses on alienation and dehumanization of society. Our product reach millions of people around the world – and we want the stories we tell to remain with them for years.

Ambition 2.

Be a company people want to be a part of

Potential impact		
Environmental	Social	Economic
No impact	Positive impact	Positive impact

We interpret social impact as affecting both our team and the broader community which we interact with on a daily basis²². Positive impact on our team – which is our focus within the context of this ambition – comprises our efforts to improve the working conditions and well-being of our employees, initiatives to promote career development and incentivize team members, as well as actions taken to reinforce our culture of diversity and inclusion. We continue to analyze trends on the labor market, and take action to position ourselves as the employer of choice for individuals who are interested in pursuing a career in the electronic entertainment industry. We are the largest employer in the Polish gaming industry, employing 1048 persons in Poland (96% of our team) and 45 persons abroad (4% of our team)²³, thus exerting a positive impact on the economy.



²²We describe our outreach activities under the ambition titled “Use our resources and competencies to support others”.

²³Aggregate figures for CD PROJEKT S.A. and GOG sp. z o.o.



Ambition 3.
Continue the green transformation on our campus and beyond

Potential impact		
Environmental	Social	Economic
Negative impact	No impact	No impact

Our potential negative impact on the environment results from the use of natural resources in ongoing activities, as well as consumption of energy which is required to play our games. To limit our footprint in this area in 2022 we adopted an official [Environmental Policy](#) where we pledge to calculate and monitor our carbon footprint, work to reduce greenhouse gas emissions throughout our value chain, promote responsible management of resources and optimize our energy requirements. In 2023 we obtained an EMAS certificate²⁴, which confirms our compliance with the highest environmental standards, comprehensive management of our impact on the environment and the climate, and diligence in working towards environmental goals. We also work to raise environmental awareness among our team members as well as business partners and tenants who engage in business activities on our premises.

Ambition 4.
Build relationships based on trust and transparency

Potential impact		
Environmental	Social	Economic
No impact	Positive impact	Positive impact

Our actions to gain trust and increase our transparency and reliability in daily business practice may have a positive impact on the society and the economy. When dealing with capital market representatives we aim to provide everyone with equal access to information about the Company, and to ensure that the information we disclose remains up-to-date, comprehensive and accurate. We manage the impact of our business dealings by acting in compliance with, among others, [Rules of the Game. CD PROJEKT Group Business and Ethics Standards](#). In 2023 we enacted [Fair Play. Code for Suppliers](#) and further improved our supplier vetting process with the use of IT solutions. Our social impact in this scope is also managed by maintaining dialogue with the gamer community. Being able to reach a broad pool of customers affects CD PROJEKT’s earnings, which also benefits the economy.

Ambition 5.
Use our resources and competencies to support others

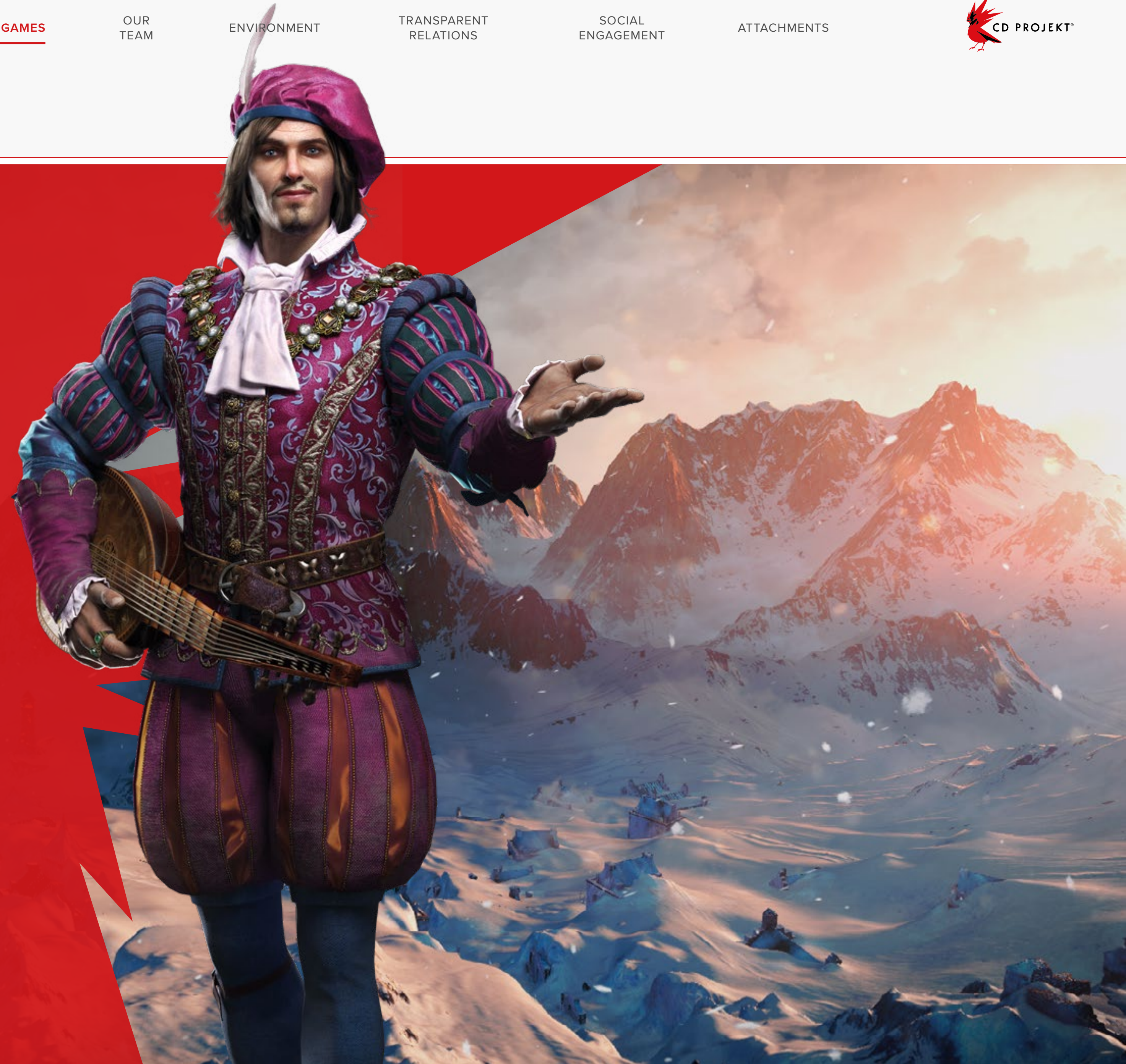
Potential impact		
Environmental	Social	Economic
No impact	Positive impact	No impact

We express our values by sharing our knowledge, skills and resources. In this scope, we benefit the society – among others – by maintaining our scholarship and mentoring program titled “Girls in the Game!”, organizing the Promised Land Art Festival and providing team members with opportunities to participate in presentations and panel discussions at trade fairs, as well as to engage in charitable activities. Two educational institutions operate on our campus (under commercial contracts): [Futuregames Warsaw](#) and AMA Film Academy. We also lease space to public-benefit organizations on preferential terms. Actions taken in this scope are guided by our Social engagement policy.

²⁴The Eco-Management and Audit Scheme is an environmental certification system instituted by the European Union pursuant to Regulation (EC) No. 1221/2009 of the European Parliament and of the Council of 25 November 2009.

05

OUR GAMES



[GRI 3-3]

Our approach to game development

ESG ambition: To provoke reflection through the memorable stories

Tomasz Marchewka, Story Director in CD PROJEKT:

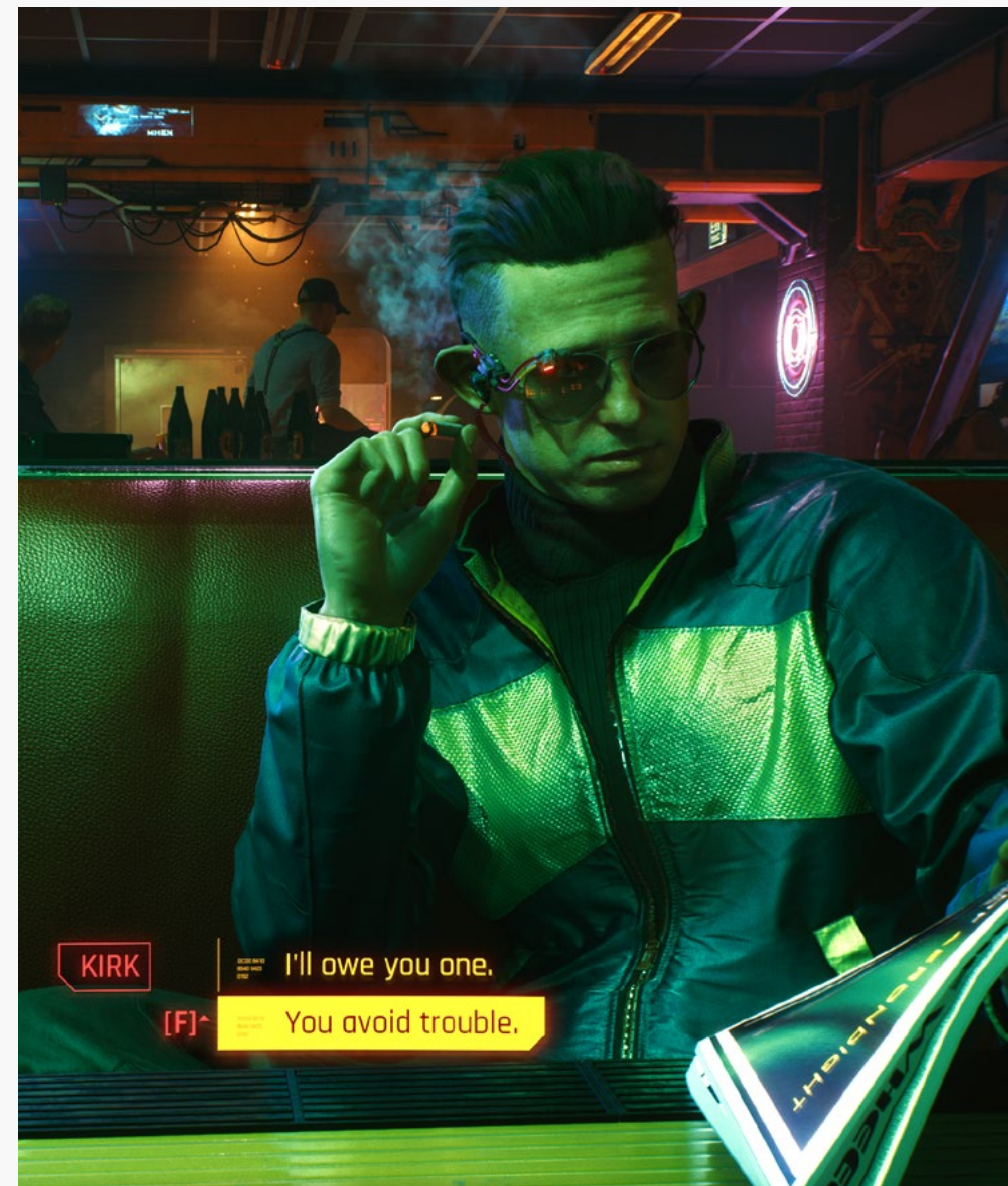
“In creating our games we are aware that – in addition to great entertainment – they are also a reflection of our culture, and this is something to which we attach great weight.

The measure of a good book, a good movie, TV series, or – indeed – a videogame is how strongly it resonates with the audience. After all, they’re messages which the creator sends to the recipient, in hope that they might find a common language. Sometimes the message is meant to amaze; sometimes it presents a question which the gamer must endeavor to answer – within and without the game world; sometimes it offers pleasure or consolation. Whatever the case, we want to provoke our audience to reflect on those aspects of our lives which are truly precious or taken for granted, surprising or unjustly neglected. We are glad if, having joined us on this in-game journey, the gamer is left with a unique experience – one which may even lead to inner change.

Games offer the unique ability to not just send a message, but engage in dialogue. They are interactive: when presenting a question we can allow the gamer to forge their own path forward and decide on their own answer.

In order for this to work – for the dialogue to be meaningful – it must evoke authentic human emotions. Our storylines, despite being set in magic, monster-ridden fantasy worlds, or a dark, technologically advanced metropolis of the future, are primarily about human beings. For example, Phantom Liberty, the expansion for Cyberpunk 2077, is presented as a spy thriller, full of deception, cybernetic enhancements and plot twists – but on a core emotional level it is primarily a story of disillusionment, desperate survival instincts, loyalty set above personal gain, and past mistakes which cannot be repaired. It seemingly tells the story of spies – but the main characters are, at their hearts, friends who had stopped trusting each other and whose tragedy rests in the fact that their trust can never be restored, however much they wish for it.

This approach is key for us – our stories must remain deeply human, but they also need to stay relevant in our present times. They have to show circumstances which our audience members can personally identify with – only then will we be able to engage in dialogue with them.”



006

OUR TEAM



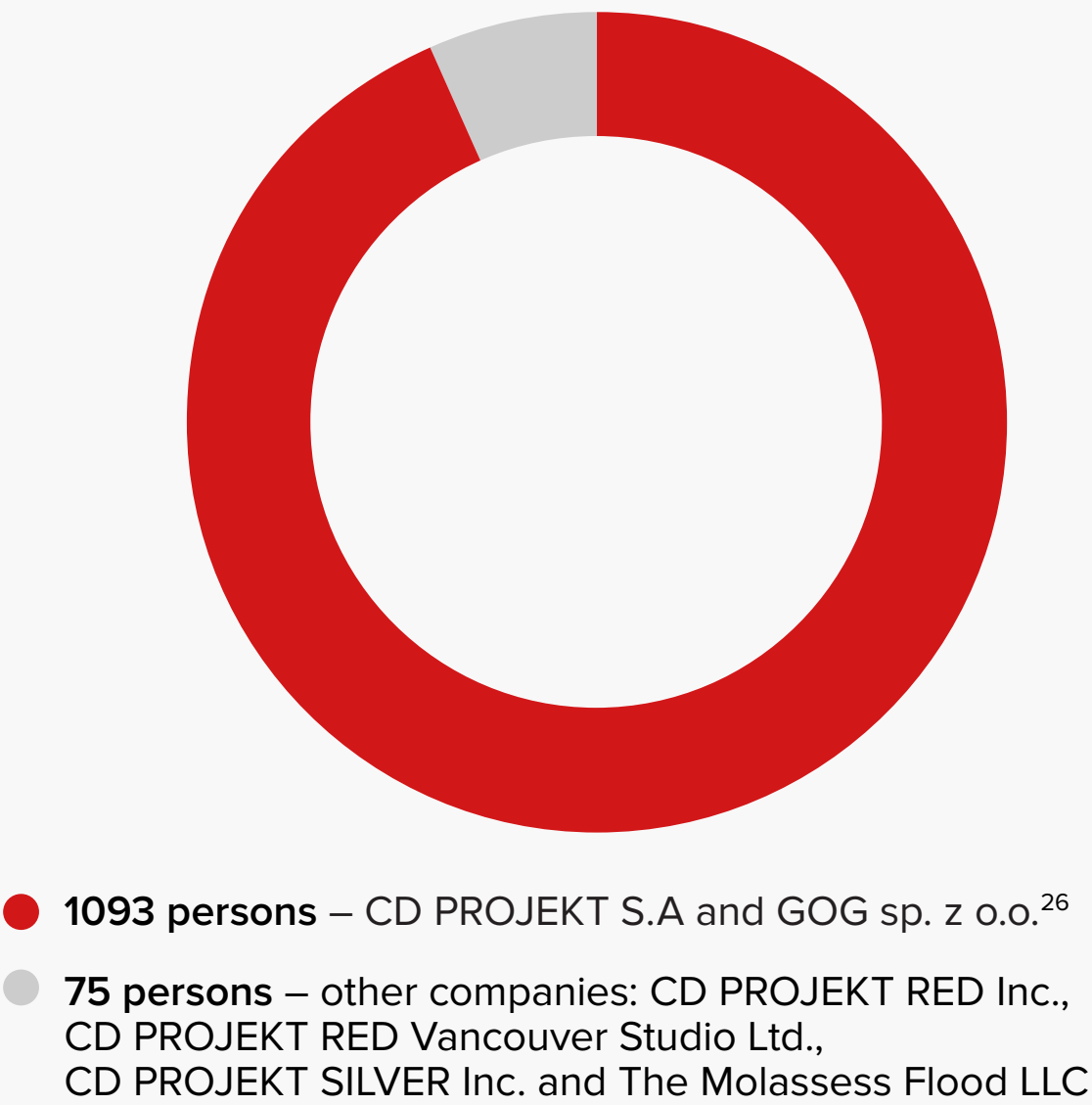
[GRI 3-3]

CD PROJEKT as an employer²⁵

The Group’s greatest strength and value are rooted in our team. We hire individuals who are passionate about delivering top-notch products and services consistent with global standards. Their talent, commitment and motivation make up the CD PROJEKT Group’s human capital. They and their creative ideas drive the success of our company.

The fundamental document governing the rights and obligations of CD PROJEKT employees is our set of Work Regulations. They are applicable to all employees, regardless of contract, type of work performed and position held.

Employment at the CD PROJEKT Group at year-end 2023:



The average age of CD PROJEKT Group team members in 2023 was 33, which is consistent with global trends in the gamedev industry.

In 2023 the churn rate at the CD PROJEKT Group²⁷ was 15.5%²⁸.

The reported churn rate is mainly influenced by the layoffs announced in July 2023, most of which took effect in the second half of 2023. The reason behind the Management Board’s decision to carry out these layoffs was the need to adapt the scale and structure of the CD PROJEKT team to the Company’s operating requirements and its development and publishing plans implemented in the framework of the CD PROJEKT Group’s strategy. The reduction process had been consulted with Red Team Representatives (RTR) – an advisory body to the CD PROJEKT Management Board, representing the interests of Company employees.

[GRI 404-2]

Team members affected by the layoffs were offered severance pay which exceeded legal requirements. The HR department further supported these persons in drawing up their resumes, preparing for interviews, and participating in the Alumni Program whereby contact is maintained in the context of future recruitment opportunities. We also provided additional psychological aid to the affected persons.

Parallel activities which aim to improve working conditions and enrich the range of benefits offered to employees have resulted in a low number of employees quitting the Company on their own initiative – the corresponding churn rate for 2023 was only 4.9%²⁹.

ESG ambition

Material issues

Goals for 2024

Goals for 2025

Sustainable Development Goals

To be a company people want to be a part of

- Offering a competitive salary package and equal opportunities for advancement
- Ensuring comfort at work and taking care of work-life balance
- Strengthening the DEI culture at CD PROJEKT by, among others, fostering inclusive leadership

- Realign career paths to better address challenges related to our business strategy
- Maintaining the gender pay gap (based on CR levels) at a maximum of 2%
- Developing and enforcing best practices related to reintegration of employees following prolonged absence
- Instituting a long-term top talent development program, ensuring continuity at key leadership positions

- Increasing the engagement score of CD PROJEKT employees to at least 75% by 2025 (2022 baseline value: 70%; 2023 yearend value: 72% - as measured using the Culture Amp)
- Carrying out pilot training in the area of DEI and incorporating DEI in the general development path



²⁵According to GRI requirements, the data contained in the “Our team” section concerns mainly persons who perform work under a standard contract of employment. In justified cases, in order to more accurately depict the context of our activities, we use the term “employees” to refer to all our team members, regardless of the underlying contract type.

²⁶As noted in the section titled “About the report”, for the purposes of this Report the term “CD PROJEKT Group” refers to CD PROJEKT S.A. and GOG sp. z o.o.

²⁷Calculated as the ratio of departures to the total number of employees.

²⁸In 2023 the churn rate at CD PROJEKT S.A. (covering all forms of employment) was 17.4%.

²⁹The corresponding figure for CD PROJEKT S.A. (covering all forms of employment) in 2023 was 4.8%.

Employee representation [GRI 2-30]

At CD PROJEKT we respect everyone's right to unionize and engage in collective bargaining. Our commitment in this regard is expressed in [Rules of the Game. Business and Ethics Standards at the CD PROJEKT Group.](#)

In 2021 the Company appointed RED Teams Representatives (RTR). RTR is an advisory body to the CD PROJEKT Management Board, which represents the interests of those employed at CD PROJEKT. It consists of thirteen team members representing all aspects of CD PROJEKT's structure. RTRs are elected for yearlong terms in anonymous and democratic elections from among all employees who do not hold directorial or other senior positions at the organization. The main task of RTRs is to identify areas which need improvement, proposing solutions and cooperating with the Management Board on implementing these solutions.

In 2023 a company committee was established at CD PROJEKT in the framework of one of Poland's nationwide trade unions. This committee was later transformed into an inter-company committee. The committee operates independently of RTR. The Company acknowledges both bodies, and the goal of its cooperation with each of them is to ensure a balance between the interests of employees and organizational efficiency, thus promoting equitable and smooth development.

No collective labor agreement is in force with regard to the Group's employees.

BEST PRACTICE



Communication with our team members is carried out using multiple channels, thus ensuring that employees are kept informed of important events affecting the CD PROJEKT Group. Each year we organize internal presentations of our Group's annual and semiannual financial results, where Board members discuss earnings for the given period along with plans for the near future, and answer questions. Throughout the year we also carry out a series of focused meetings with members of the Board and other top managers, where employees can inquire about topics of interest to them. In 2023 we held a Town Hall meeting where Board members presented our core values while team members had the opportunity to familiarize themselves with the progress of ongoing development work.



Talent acquisition

We want to create conditions which would enable us to attract, retain and incentivize persons who possess key skills and experience required for further dynamic growth of the Group. This is one of the most important factors which enable us to compete for talent on the global electronic entertainment market.

In 2023 the CD PROJEKT Group received over 33.5 thousand job applications, with 138 candidates ultimately accepting employment offers.

Interested in joining the CD PROJEKT Group? Want to learn more about our recruitment process? Visit www.cdprojekt.com and reply to a selected job posting – or simply send us your spontaneous application!

Employee recommendation system

CD PROJEKT employees can recommend candidates for open jobs using our internal system. In 2023 we recruited 15 persons through the employee recommendation system.

Candidate experience surveys

We strive to improve our recruitment process and appreciate any feedback from people who have taken part in it. At CD PROJEKT we measure the quality of our recruitment by conducting candidate experience surveys (since 2020).

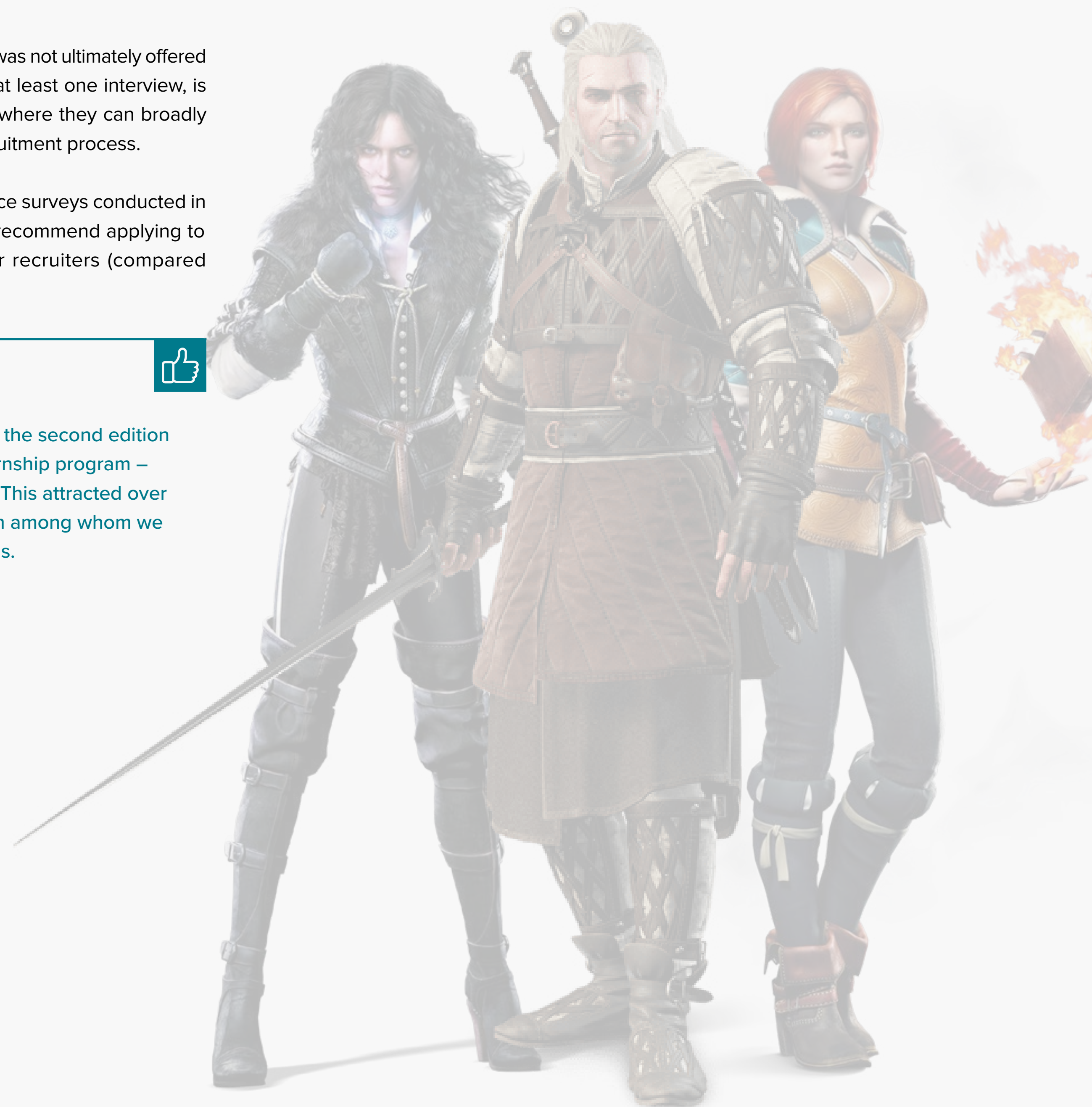
In this context any candidate who was not ultimately offered a position, but who took part in at least one interview, is asked to fill out a questionnaire where they can broadly rate and comment upon our recruitment process.

According to candidate experience surveys conducted in 2023 95% of candidates would recommend applying to CD PROJEKT or contacting our recruiters (compared to 86% in 2022).

BEST PRACTICE



On 1 July 2023 we launched the second edition of our 3-month summer internship program – **RED SUMMER INTERNSHIP**. This attracted over 2.8 thousand applicants from among whom we eventually selected 19 interns.



Professional development and engagement

Training [GRI 404-2]

To us, professional development entails not only improving one’s technical skills and specialization, but also soft skills and exchange of experiences among teams. In 2023, similarly to preceding years, we provided open professional development paths geared to improve key strategic skills of team members, as well as individual training plans available to all employees.

CD PROJEKT offers an open-access training and development platform called HR Skill Tree. It enables staff to sign up for training, conferences and industry events, keep track of all development meetings conducted with HR Partners and obtain access to in-house training and development materials.

In 2023 79.6% of CD PROJEKT employees took part in at least one training course.

General development path

The general development path covers training in the scope of soft skills, such as management of emotions, providing feedback, negotiating, managing impression, teamwork and team communication using the Insights Discovery tool. This training is organized on a periodic basis and open to all employees.

In addition to soft skill training in 2023 we also organized training in the use of Agile methodologies, along with a series of Unreal Engine 5 workshops led by Epic Games. A range of training events were held by our team members wishing to share their experience – this involved, among others, storytelling and quest design in games, as well as personal asset management.

Managerial development path

Improving the leadership skills of managerial staff is particularly important from the point of view of implementing the Group’s business strategy. In 2021 we created a new long-term development program at CD PROJEKT to enhance key competences of our managers. The program is tailored to challenges existing at various management levels and involves, on average, 90 hours of instruction. Each manager may choose the training type, level of advancement and formula, all tailored to their individual preferences and needs. In 2023 a total of 102 persons took advantage of this training path.

The diverse offering includes both online and onsite workshops that are available in two language versions. Moreover, we diversify our training courses by offering training based on strategic games, case studies, action learning and short workshops (compact learning) lasting 2 hours each. The path begins with the Get Ready to Lead training which prepares newly promoted or newly hired managers to perform their roles. Get Ready to Lead consists of several workshop meetings. Follow-up modules are dedicated for more experienced managers, and focus on skills such as managerial courage, change management or employee development.

BEST PRACTICE

In 2023 our managerial development path was extended with a new, internally developed program called RED2RED Learning. Its goal is to enable managers to share their knowledge and experience, build mutual trust and enable leaders to help one another. The program is based on action learning and peer to peer coaching, and consists of six meetings where groups of managers discuss pending leadership challenges.

Diagnosis and feedback constitute a very important aspect of our managerial development process. In 2023 we rehashed the EmpowerED program which now begins with a competence analysis phase. Owing to this change, EmpowerED participants can now proceed through successive development stages in accordance with their personal, customized plans.

With regard to development of key competences among top management, in 2023 the Management Board of CD PROJEKT took part in a Leadership Development Intensive (LDI) course based on John Scherer’s proprietary methodology and comprising intensive coaching activities.

All development programs are assessed from the point of view of their effectiveness. In this process we employ the Kirkpatrick model, which, in addition to measuring trainee satisfaction, also takes into account knowledge gain and behavioral changes. This helps us ensure that the programs have the desired effect and properly address the needs of the organization and its employees, thereby contributing to implementation of the Company’s strategy.

Evaluation and feedback system
[GRI 404-3]

The ongoing Agile transition at CD PROJEKT RED requires us to adapt the employee appraisal criteria to the new approach in team management. The essence of the changes in the employee appraisal system rolled out over the past two years is to shift focus from assessing the individual effort of each staff member to joint effort for the purpose of incentivizing more effective communication processes and attaining quality goals.

One of the ways in which we supported our Agile transition in 2023 is continued bolstering of CD PROJEKT’s feedback culture. Our activities in this area include encouraging all staff members to provide feedback to their colleagues and continuing to develop tools which assist in this process (360-degree appraisals, 180-degree appraisals, feedback tab in employee portal). In addition, in the context of this activity in 2023 we added a tool to our intranet, allowing employees to praise one another in the form of brief messages called “ShoutOuts”.

In 2023 (as in 2021 and 2022) 100% of CD PROJEKT employees received, on at least one occasion, supervisor feedback concerning their attitude and quality of work in the given period.

Culture Amp engagement survey

In order to better address the needs of our employees and remain up to date on the challenges they face in 2022 we rolled out the Culture Amp tool for measuring team engagement. This helps us keep track of the condition of our organization and implement – in collaboration with employees – solutions which aim to increase engagement. The first Culture Amp survey was carried out in the fall of 2022. Currently, based on its results, we are implementing a range of initiatives on the level of the organization as a whole, as well as within individual teams. In 2023 we focused on bolstering leadership, enhancing collaboration between teams, supporting feedback and appraisal activities, improving the efficiency of internal communication, and further expanding our offer for employees.

Furthermore, in 2023 we also increased the frequency of mini-surveys grouped under the name Pulse Check, which enable us to track changes in internal attitudes and identify fluctuations in engagement against the backdrop of our Company’s operational landscape.

2023 Culture Amp outcomes	CD PROJEKT	GOG
Engagement score	72%	75%
Participation in the study	73%	93%

Reinforcing the DEI culture at CD PROJEKT, among others by promoting inclusive leadership

At CD PROJEKT we want to surround ourselves with people for whom work is a passion and a source of inspiration – people who want to work with us on unique, evocative games which go straight to the hearts of gamers worldwide.

It is with our team in mind that we try to build a healthy work environment where professional ambitions can be pursued and skills gained. In our daily work we try to ensure that every employee’s voice is heard.

Since 2018 a [Diversity Policy](#) has been in place at CD PROJEKT. This policy sets forth core values upon which our organizational culture is based.

CD PROJEKT is also a signatory of the Diversity Charter – an international initiative under the auspices of the European Commission which obligates us to forbid discrimination in the workplace and take action to create and promote diversity and engage team members and business partners in such actions.

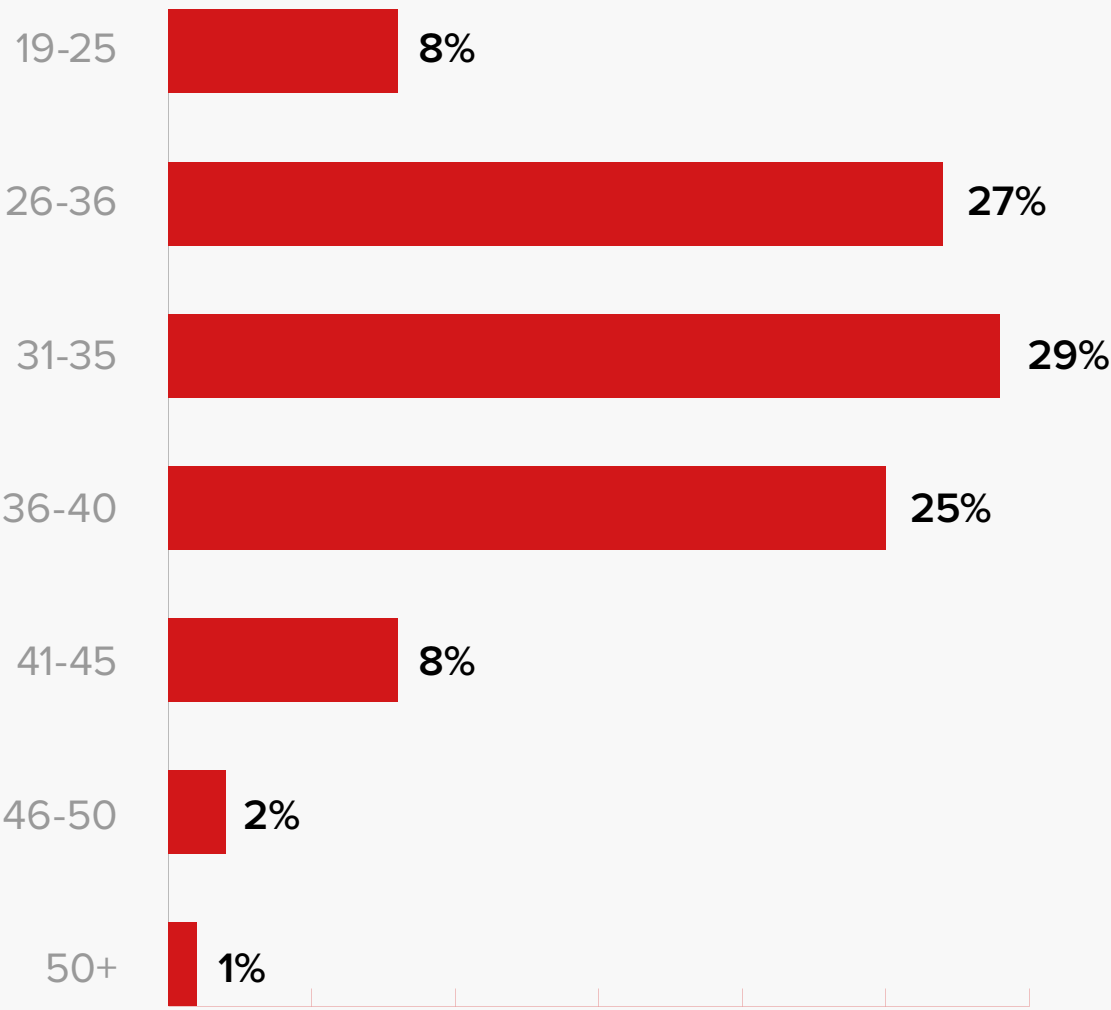
Our commitments regarding diversity and inclusion are expressed in [Rules of the Game. Business and Ethics Standards at the CD PROJEKT Group.](#)

At year-end 2023 foreign nationals accounted for 18% of employees at Polish member companies of the CD PROJEKT Group. At the end of 2023 we employed nationals of 45 countries from around the world, including Ukraine, France, Italy and Great Britain.

At year-end 2023 CD PROJEKT employed six persons with disabilities. Our Warsaw HQ is adapted to the needs of such people – among others, buildings on the campus are equipped with wide elevators, four accessible toilets, as well as dedicated parking spaces for the disabled right next to the main entrance. We also strive to remain open to the unique needs of each employee, customizing the workstations to the specific requirements associated with their health condition or disabilities.

CD PROJEKT Group	2023	2022
Percentage share of women in workforce	31%	32%
Percentage share of women among holders of managerial positions	24%	24%
Percentage share of women among developers	21%	24%

The workforce of CD PROJEKT Group by age category³⁰



³⁰Given the age breakdown of our team we do not currently run programs which assist employees in transitioning to retirement [GRI 404-2].



Adopting a D&I strategy

In February 2023 the Management Board of CD PROJEKT adopted a formal Diversity & Inclusion Strategy, which specifies our priorities in the area of diversity, along with initiatives we want to carry out in 2023-2025. In 2023, in the framework of the planned activities, we initiated a survey of parental needs, along with the needs and development obstacles faced by women. We also initiated the “Inclusive Leadership” program.

Find out more about our D&I strategy [here](#).

Survey of needs and organizational development obstacles faced by women

In 2023, in collaboration with an independent external advisor, we carried out a survey of development obstacles faced by women at CD PROJEKT. This study involved analysis of, among others, employment data, coverage of women’s needs in internal and external Company communications, as well as our HR structure and procedures. We also carried out discussions in the framework of two focus groups: a general group (involving women representing various departments and a full demographic cross-section of our organization), and a development group (which focused on the challenges and experiences of game developers) – in addition to individual interviews. The collected data was subjected to analysis in order to identify major challenges in the context of professional

development of our female employees. Results were presented in the form of a report supplemented with a list of proposed further actions and projects aligned with our adopted D&I Strategy.

Activities promoting diversity

Cultural Diversity Week

In connection with the World Day for Cultural Diversity for Dialogue and Development, in May 2023 we organized an event called the Cultural Diversity Week. The goal was to foster cultural sensitivity among team members, and establish a forum where our employees can get to know the cultural habits of their colleagues. During this event a D&I expert organized a webinar devoted to counteracting subconscious cultural bias.

The #SayHiToDiversity! Campaign

In 2023 Olga Cyganiak, Senior Producer at CD PROJEKT, took part in a national educational campaign titled #SayHiToDiversity! The goal of this activity was to emphasize the multidimensional nature of the human psyche and show that appreciation for the individuality of employees helps foster an inclusive culture in the workplace. Joining this campaign marks another stop on our path towards promoting diversity in the gamedev industry. Throughout a period lasting over 3 weeks our banners promoting the campaign were displayed on outdoor advertising screens in Warsaw, Kraków, Poznań, Katowice and Szczecin over 124.4 thousand times.

Pride Month

To celebrate Pride Month we took part in the Pride Parade, under the OPEN WORLD banner which, on the one hand, relates to our games while on the other hand underscores openness and acceptance – values which guide CD PROJEKT in its daily activities. Approximately 70 of our employees took part in the Parade, including the former CEO of CD PROJEKT – Adam Kiciński. In 2023 we also made a donation to Kampania Przeciw Homofobii – an organization which provides aid to the LGBTQ+ community and engages in legal and social advocacy.





Offering competitive remuneration and equal career advancement opportunities

At CD PROJEKT we attach great weight to equal treatment of all our team members. Our commitment in this regard is expressed in [Rules of the Game. Business and Ethics Standards at the CD PROJEKT Group](#). We continue to improve our personnel-related policies with the aim to ensure equitable remuneration and career development opportunities for all our employees regardless of gender, age or nationality. Our practices in this regard are consulted with key internal stakeholders.

We consider a number of factors when deciding on a promotion, including looking at, among other things, the competence of the employee, their performance in their current role and their potential for development in the context of our business and organisational needs.

Approach to remuneration [GRI 2-20]

To make sure that our remuneration is consistent with market standards, we carry out annual reviews of our pay grid, comparing our salaries to market benchmarks for each type of job. We also monitor the Compa Ratio (CR) coefficient.

Given the structure of employment in the gamedev industry, both in Poland and globally, and the resulting difficulties in obtaining comparative data for all tiers of the corporate hierarchy, at CD PROJEKT pay gap analysis – which assesses

potential differences in remuneration offered to men and women – is based on Compa Ratio coefficient. This coefficient, in our opinion, accurately reflects the variance in remuneration which may be attributable to employee gender.

Compa Ratio (CR) indicators for all employees at the CD PROJEKT Group in 2022 and 2023

	2023	2022
CD PROJEKT	101%	97%
GOG	100%	97%

CR provides a baseline for determining the midrange point of compensation brackets at each level. The listed values represent CR derived for women and men respectively.

Results achieved in 2023 (101% and 100% respectively) indicate that there is essentially no difference in remuneration offered at each given position which could be attributed to the employee’s gender.

Team benefits [GRI 401-2]

In addition to financial remuneration for staff, CD PROJEKT also offers a number of fringe benefits. Their scope depends on the place of employment and is independent of working hours.

- **Healthcare** – we provide funding or co-funding of medical subscriptions in private medical facilities belonging to MEDICOVER, ENEL-MED and LUXMED networks. It is also possible to include family members or life partners in this form of insurance coverage.
- **Cafeteria benefits plan** – in 2022 we rolled out a cafeteria plan where we, on a monthly basis, add points to participants’ personal accounts. Team members may exchange these points for a range of additional benefits, including sports cards, additional medical coverage or one-off perks such as movie/theater tickets or vouchers redeemable in selected stores. The plan is successively being expanded based, among others, on employee feedback.
- **Campus gym** – the Warsaw studio operates a gym which is available 24 hours a day and equipped with trainers and a climbing wall. Yoga sessions and back exercises are periodically organized.
- **Canteens** – three canteens operate at the Warsaw campus, serving breakfasts and lunches with vegetarian and vegan options. All canteens are subsidized by Group member companies, ensuring affordable meal prices for employees.

- **Flexible working hours.**
- **Dogs at the office** – we are a dog-friendly employer. By following a few basic rules, each employee may bring his or her dog to the office. The presence of a dog creates an opportunity to build good rapport with colleagues, improves cooperation and promotes positive team dynamics.
- **Events** – integration meetings such as Social Fridays, a Christmas party and a summer picnic are held each year.

In 2023 the portfolio of employee benefits did not include life insurance coverage. Retirement benefits and parenting leave are handled in accordance with the provisions of the Labor Code.

Earnings bonuses [GRI 401-2]

In 2023 we introduced an important change in our remuneration policy: annual earnings bonuses previously paid out to all employees was, beginning with January 2023, proportionally merged with their base salaries. This change makes remuneration more predictable for our team members; it is also consistent with the Company's long-term strategy, and will augment its implementation in the coming years.

Share-based incentive program [GRI 401-2]

Our goal is to incentivize our team members to remain with the CD PROJEKT Group for years. Among the tools we use for this purpose are long-term incentive plans based on the rights to acquire the Company's shares at a historical price set at the outset of the plan. The Group has successfully implemented three incentive plans since its establishment.

In 2023, based on resolutions adopted by the General Meeting on 18 April 2023, two new incentive programs were instituted at CD PROJEKT S.A., covering the financial years 2023-2027: Incentive Programs A and B respectively.

Incentive Program A is based on deferred share take-up rights and is addressed to persons who are not members of the Company's Management Board. Exercise of entitlements under Incentive Program A is conditioned upon fulfilling a loyalty condition.

Incentive Program B is addressed to members of the Management Board of CD PROJEKT and other top managers at the Group. Entitlements assigned under Incentive Program B – in the form of options to purchase Company shares at a fixed historical price – can be exercised upon fulfilling certain earnings conditions (covering 70% of entitlements), market conditions (covering 30% of entitlements), individual conditions (in selected cases), as well as – in each case – a loyalty condition.

Detailed information concerning Incentive Programs A and B currently in force at the Company, including definitions of the applicable loyalty, earnings and market conditions, can be found on our [website](#).

Employee Pension Scheme [GRI 401-2]

The Employee Pension Scheme (PPE) is a form of voluntary, non-public, additional savings for retirement. It enables participants to put aside money under the third pillar of the pension system. Saving money under an Employee Pension Scheme is long-term in nature – the contributions are paid by the employer and may also be paid by employees on an optional basis.

At CD PROJEKT the Employee Pension Scheme was launched in December 2019. For employees who satisfy the length-of-employment criterion, the employer pays the base contribution of 3.5% of the employee's gross income, while the option available to the employee is to pay an additional contribution in an amount of his or her choosing (at least 50 PLN). At year-end 2023, 65.6% of eligible CD PROJEKT employees participated in the Employee Pension Scheme. The Employee Pension Scheme is managed by Goldman Sachs TFI S.A.



Workplace comfort and work life balance

Occupational health and safety (OHS) [GRI 403-1, 403-3, 403-4, 403-5, 403-9]

OHS management systems are in force at CD PROJEKT Group member companies, covering all personnel hired under a contract of employment – since the moment of recruitment, which is when they are referred for initial medical examination. Employees also undergo regular or ad-hoc medical tests in accordance with referrals considering the nature of their work. Information concerning the health of our employees is covered by the physician-patient privilege, and is not processed by our organization for any purpose. Access to medical certificates is limited to persons in charge of HR, in accordance with their assigned duties.

On the first day at work, employees undergo an orientational OHS e-learning course (valid for 1 year for administrative and office positions and 6 months for management positions). Periodic training is also carried out; it is valid for 6 years for administrative and office positions and 5 years for management positions. In addition, we organize and carry out specialized training focused on e.g. first aid, operating AED defibrillators or fire safety regulations.

Occupational Health and Safety Committees are in place at CD PROJEKT Group member companies. They are advisory and consultative bodies for the employer, which help ensure that occupational health and safety conditions are observed and improved. At periodic meetings members of OHS commissions discuss matters related to oc-

cupational safety, provide relevant advice and recommendations to employers, and apply for solutions which help improve workplace conditions and safety.

One workplace accident was reported at the CD PROJEKT Group in 2023.

In addition to ensuring compliance with occupational health and safety (OHS) regulations, we also engage in initiatives which benefit the health and well-being of our team members.

Activities promoting health and well-being [GRI 403-6]

Workplace comfort

In 2023 we took action to improve workplace comfort, including by:

- swapping over 200 desks for adjustable desks at which employees can work either in a sitting or standing position,
- creating a gaming zone equipped with gaming consoles and a table for board games,
- opening a new canteen – Pizza Padre, offering breakfasts, pizza and Italian desserts,
- launching a monthly cycle of “Geek Day” events which involve board game tournaments,
- rearranging our social space, adding more relaxation areas,

- opening a new multi-story parking lot, which also houses a gym and a rooftop terrace; the garage is equipped with electric car charging stations and additional bicycle stands. For more information see the section titled “Environment”.

Cancer awareness campaign

In October and November 2023 the fifth edition of a campaign which promotes awareness of early detection, diagnosis and treatment of cancer, was organized on our premises in Warsaw, Kraków and Wrocław. In the framework of this campaign members of our team underwent over 350 blood tests and over 420 USG examinations. We also carried out a series of webinars devoted to menstrual health and hormonal changes in men, as well as expert consultations concerning early detection of tumors.

Autism Spectrum Awareness Day

On Autism Spectrum Awareness Day our internal communications drew attention to the workplace needs of neurodiverse individuals. In this framework, we – among others – encouraged neurodiverse employees to communicate their individual preferences concerning team collaboration.

“Minding Your Mind” campaign and psychological support

In 2023 we continued with our series of training courses organized by experts from the SWPS University of Social Science and Humanities under the name “Minding your Mind”. Open webinars were devoted to mental health and

well-being, addressing issues such as interpersonal relations, promoting healthy habits, self-support and mutual support in dealing with change, and the health benefits of physical activity. A total of 12 webinars (18 hours of instruction) was organized in Polish and English, attracting nearly 300 employees. We also organized five closed workshops (14 hours of instruction) on dealing with stress, resilience and relaxation exercised – with approximately 60 of our employees attending.

If required, our team members can participate in free-of-charge individual psychological and psychiatric consultations, which are offered in five languages.

GOG BEST PRACTICE



In 2023, to mark major events occurring on the GOG platform, GOG provided support to the Safe In Our World foundation which deals with matters of mental health in the video gaming community, including among gamers. A series of interviews, articles and contests were organized in collaboration with the foundation, with participants able to win gaming mental health journals. The goal of each of these activities was to promote mental health both among GOG employees and throughout the gaming community.



³¹ According to Ukie research up to 18% of videogame developers self-identify as neurodiverse, and may experience workplace challenges and difficulties significantly different from those faced by neurotypical individuals.



Menstrual leave

Since April 2023 all Polish member companies of the Group provide menstrual leave – a fully paid day off for which any menstruating employee is eligible. It may be taken once per month, either as a full day off or in the form of partial leave; however, unused hours do not accumulate and are not converted into additional pay. Introducing menstrual leave promotes an inclusive work environment, and also helps break the menstrual taboo. Between April and November 2023 approximately 10% of menstruating employees (ca. 35 persons monthly) took advantage of this program.

CD PROJEKT for parents

Mother's Day and Father's Day

To mark Mother's Day and Father's Day we organized two webinars: "Work-life integration" and "Building Self-Confidence in Children: Tips for the Happy Adult", which aim to support parents in reconciling their professional obligations with their family life.

Parental needs survey

In March and April 2023 we carried out a survey of the needs voiced by CD PROJEKT parents. The goal was to enable in-depth analysis of workplace and work schedule arrangements suitable for parents, their development prospects and benefits which may be offered to them. The survey was carried out by independent experts in the framework of five focus groups comprising parents of

children from various age brackets. It resulted in a report which details specific conclusions and recommendations for further actions.

RED Summer Camp

Childcare during vacation time was among the issues most frequently brought up by parents participating in the survey. In response, in 2023 we organized the second edition of our summer day camps for children of CD PROJEKT Group employees. Camps were held in Warsaw (two rounds) as well as in Kraków and Wrocław. The costs of weeklong day care were partially covered by the Company. The initiative was very warmly received by parents, and the two editions of the program attracted over 60 children.

Family & Friends Day

On 12 May 2023 CD PROJEKT invited friends and families of employees to its Warsaw HQ as well as to offices in Kraków and Wrocław. Guests had the opportunity to visit spaces where their friends and relatives work, and participate in special events such as studio tours and presentations for older guests, or drawing contests and 3D printing presentations for younger ones. On that day we were visited by over 300 people.

07

ENVIRONMENT



[GRI 3-3]

As we strive to maintain a balance between the Group’s dynamic growth and care for the natural environment, we take steps to ensure that our activities are conducted in a responsible manner, consistent with the general principles of sustainable growth. In particular, we take action to mitigate our environmental footprint and counteract climate change.

To the best of our knowledge, in 2023:

- no deviations from applicable environmental protection laws and regulations were identified at the CD PROJEKT Group,
- the CD PROJEKT Group did not incur any penalties as a result of deviations from environmental protection laws and regulations.

CD PROJEKT environmental policy and EMAS³²

In 2022 we adopted an Environmental Policy in which we pledge to reduce the negative impact of our activities on the environment and the climate, and take environmental issues into account when making business decisions. In line with this commitment, in 2023 we carried out the following activities:

- deploying an Eco-Management and Audit Scheme compliant with the ISO 14001 standard and the EMAS regulation; publishing an [Environmental Statement](#) and obtaining an EMAS certificate as the first gamedev company in Poland;
- expanding the solar power array at CD PROJEKT’s Warsaw campus,
- calculating and monitoring our Scope 1, 2 and 3 carbon footprint,
- modernizing part of our server infrastructure,
- optimizing energy consumption of our servers while maintaining high efficiency,
- relying on more eco-friendly construction materials (recycled steel, low-emissions concrete, structural timber and wooden façade panels) when constructing our new office building,
- collecting rainwater and using it to water greenery at our campus,
- planting over 4.8 thousand plants, including on the external walls of our parking structure,
- encouraging team members to develop eco-friendly habits – e.g. commuting by bike, electric vehicles or public transport,
- enabling remote work which cuts down emissions associated with commuting to the office,
- climate SWOT analysis consistent with TCFD recommendations.

Eco-Management and Audit Scheme is an environmental certification system introduced by the European Union on the basis of Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS). Registration in the EMAS system and submitting to an EMAS audit demonstrate that the organization abides by the highest standards and requirements related to environmental protection. [Find out more](#)



ESG ambition

Material issue

Goal for 2024

Goal for 2030

Sustainable Development Goals

To continue the green transformation on our campus and beyond

Reducing greenhouse gas emissions in the value chain and implementing energy-efficient solutions

Establishing base assumptions for CD PROJEKT Group’s 2030 emissions reduction plan

Reducing absolute GHG emissions at the CD PROJEKT Group in Scopes 1 and 2 by 42% by 2030 (compared to 2023 baseline)



³²Eco-Management and Audit Scheme. More information about EMAS can be found further on in this Report.

In the framework of our Eco-Management System, which is compliant with the ISO 14001 standard and the EMAS regulation, we undertook the following activities:

- we carried out an environmental audit,
- we identified and assessed those aspects of our activity which have, or may have, an impact on the environment,
- we set goals and specified tasks in areas where our environmental impact is greatest,
- we defined environmental indicators which deal with energy, atmospheric emissions, water, waste, packaging, and use of land in the context of biodiversity – these will form the basis for an environmental assessment of our activities in each given year,
- we identified potential environmental emergencies along with our responses and methods to prevent situations which may result in environmental harm,
- we updated our environmental risk/opportunity analysis,
- we carried out an internal environmental audit, along with an audit of our compliance with environmental regulations,
- we published the CD PROJEKT Environmental Statement,
- we submitted to external verification by an accredited independent EMAS auditor,
- we applied to the General Directorate for Environmental Protection, and were subsequently entered in the EMAS registry.

EMAS certification objectively confirms that we meet the highest environmental standards, and that our longstanding efforts to promote environmental protection are bearing fruit. Our Environmental Statements, which are subject to annual updates and attestation, will provide comprehensive information on our impact on the environment and the climate, thus guaranteeing transparency and providing access to information for all stakeholders.

Carbon footprint

[GRI 305-1, 305-2, 305-3]

The CD PROJEKT Group measures and discloses its carbon footprint in three scopes (1, 2 and 3) which together reflect the extent of our impact on the environment. Carbon footprint is defined as the aggregate emissions of greenhouse gases caused – directly or indirectly – by the company³³. It covers both direct emissions, such as burning fuels, but also indirect emissions – eg. in the process of generating electrical and heat energy. Carbon footprint is expressed as carbon dioxide equivalent (CO₂e), with a ton of carbon dioxide equivalent (tCO₂e) being its basic unit. It is calculated in accordance with the requirements of the GHG Protocol³⁴.

Much like in preceding years, In 2023 we focused on calculating the emissions of the CD PROJEKT Group in Poland³⁵. The following greenhouse gases were taken into account: CO₂, CH₄, N₂O. Results are consolidated in the framework of CD PROJEKT Group’s operational control in Poland, taking into account 100% of emissions at each analyzed location, as specified in the GHG Protocol. 2023 figures are used as the baseline because this peri-

od accurately reflects our standard working arrangements and the associated emissions – unlike earlier years, in which results were affected, among others, by the COVID pandemic.

Emissions of greenhouse gases by the CD PROJEKT Group encompass the following:

- **Scope 1** – direct GHG emissions at premises owned or managed by the Group. At CD PROJEKT this comprises emissions from burning fuels and release of coolant agents.
- **Scope 2** – indirect GHG emissions associated with generation of electrical and heat energy consumed by the Group. Scope 2 emissions are calculated using market-based indicators (published by each energy distributor) or location-based indicators (based on the average emission coefficient for the given territory, e.g. Poland).
- **Scope 3** – other indirect GHG emissions not covered by Scopes 1 and 2, identified throughout the value chain. Scope 3 includes upstream emissions (purchase of raw materials and services, capital assets, energy- and fuel-related emissions not covered by Scopes 1 and 2, transportation and distribution of raw materials, waste management, business travel, employee commuting) and downstream emissions (transportation and distribution of our products, consumption of energy when playing games, and emissions related to leased assets³⁶).

³³Custom definition used for our own purposes.

³⁴The Greenhouse Gas Protocol A Corporate Accounting and Reporting Standard Revised Edition, GHG Protocol Scope 2 Guidance oraz Corporate Value Chain (Scope 3) Accounting and Reporting Standard.

³⁵This is due to the relative immateriality of emissions caused by the Group’s foreign entities.

³⁶Leased assets comprise space leased to external entities at the Group’s Warsaw campus. The corresponding calculation takes into account consumption of heat by lessees and leakage of coolant agents from air conditioning units on leased premises.



In 2023 we swapped emissions indicators from those published by KOBIZE³⁷ to those published by DEFRA³⁸, since the latter cover a broader range of greenhouse gases, including gases produced by combustion of liquid fuels. The database published by DEFRA is currently based on the IPPC’s Fourth Report for so-called WTT emissions, and on the Fifth Report for the other emission sources we included in this year’s calculations. Indicators for coolant agents are also derived from the DEFRA database and calculated on the basis of baseline data contained in the IPCC Sixth Assessment Report – Global Warming Potentials (AR6). With regard to thermal energy, we rely on energy generation intensity indicators reported for Poland by the Energy Regulatory Office (URE).

With regard to electrical energy, we rely on indicators published by each energy distributor (market-based method) and the average emissions indicator for electrical energy in Poland, based on KOBIZE publications (location-based method). With regard to selected resources as well as waste, tap water, transportation, business travel and commuting we rely on the DEFRA database. With regard to other resources, emissions data is derived from documentation obtained from manufacturers and the Ecoinvent 3.8 database.

In 2023 we calculated the so-called “outside of scope” emissions for liquid fuels (gasoline and diesel fuel) which include bio-components, using the appropriate indicators published by DEFRA. Additionally, we calculated our “outside of scope” emissions from combustion of fuels in 2021-2022. While calculated in accordance with the stated requirements, under the GHG Protocol such emissions are reported outside of the respective scopes.

³⁷National Center for Emissions Management.
³⁸UK Department for Environment, Food and Rural Affairs.
³⁹Greenhouse gases.

	2023	2022	2021
Scope 1	28	25	35
Scope 2 LB	1911	1644	1523
Scope 2 MB	1941	1686	1664
1+2 LB	1939	1669	1558
1+2 MB	1969	1711	1699

The CD PROJEKT Group’s Scope 1 and 2 carbon footprint in 2021-2023

[GRI 305-1, 305-2]

In 2023 our **Scope 1** GHG³⁹ emissions totaled 28 tCO₂e. No emissions related to leakage of coolant agents from air conditioning units were reported in 2023.

In 2023 we recalculated our **Scope 1** fuel combustion emissions in 2021 and 2022 according to DEFRA indicators.

In **Scope 2**, our greenhouse gas emissions calculated using the location-based (LB) method were 1911 tCO₂e, which is 267 tCO₂e more than in 2022. When applying the market-based (MB) method, our **Scope 2** emissions in 2023 work out to 1941 tCO₂e (increase by 255 tCO₂e). These increased emissions in **Scope 2** are caused by increased consumption of electrical energy at the Group’s offices compared to 2022, when fewer employees were physically present at the office, as well as by opening the new parking structure at the Warsaw campus. The GHG figures reported for 2023 more accurately reflect our actual environmental footprint under standard working conditions (post COVID), and serve as the baseline for our

emissions reduction plan. The results obtained with the location-based method are lower than those obtained with the market-based method, as a result of the values of the adopted emission factors. For the location-based method, we used the factor published by KOBiZE, while for the market-based method, we used the factors published by energy providers. For our majority provider of energy for offices and server rooms, this indicator has a higher value than the indicator published by KOBiZE.

The vast majority (99%) of greenhouse gas emissions generated in the course of the Group’s operating activity (**Scope 1** and **2**) fall within **Scope 2**: those are indirect emissions from the consumption of purchased electricity and heat. The bulk of this figure is related to consumption of electrical energy – 74% of the overall emissions in **Scopes 1** and **2** combined. The remaining aggregate **Scope 1** and **2** emissions (approximately 25% in total) is related to consumption of heat. **Scope 1** emissions are identified only at CD PROJEKT S.A. and are related to consumption of fuel in vehicles operated by the Company and combustion of fuel in local sources (emergency generator powering the server room); they contribute approximately 1% to the Group’s overall carbon footprint in **Scopes 1** and **2**.

The structure of **Scope 1** and **2** GHG emissions underscores the importance of the existing commitment to improving energy efficiency at our offices and transition to renewable energy sources. 400 photovoltaic panels with a total capacity of 135 kWp deployed at our campus buildings in Warsaw generate benefits associated with lower greenhouse gas emissions.

BEST PRACTICE



Within the framework of our working group we carried out decarbonization workshops, which resulted in setting Scope 1 and 2 reduction goals for the CD PROJEKT Group. We also identified potential actions which would lead to reduction of emissions in areas where our emissions are the highest.

Our goal is to achieve a reduction in absolute Scope 1 and 2 GHG emissions for the CD PROJEKT Group as a whole by 42% by 2030, compared to the 2023 baseline value – which is consistent with the Paris Agreement (1.5oC target).

To illustrate the intensity of GHG emissions, we refer to indicators and parameters specific to the Group’s activities, such as office space and number of employees.

Intensity of Scope 1 and 2 greenhouse gas emissions at the CD PROJEKT Group in 2021-2023

[GRI 305-4]

	2023	2022	2021
Emissions per m ² of space used (location-based) [t CO ₂ e/m ²]	0.11	0.12	0.12
Emissions per m ² of space used (market-based) [t CO ₂ e/m ²]	0.11	0.13	0.13
Emissions per employee (location-based) [t CO ₂ e/person]	1.84	1.44	1.39
Emissions per employee (market-based) [t CO ₂ e/person]	1.87	1.47	1.52

Other indirect GHG emissions at the CD PROJEKT Group (Scope 3) [GRI 305-3]

Scope 3 covers other indirect GHG emissions throughout the organization’s value chain. It is divided into 15 categories. Following analysis we selected those categories which are material from the point of view of the Group’s activities and for which adequate input data can be obtained. We discarded categories which do not apply to the Group’s activities, which are regarded as immaterial, or for which no reliable estimates can be provided. With regard to **Scope 3**, we primarily relied on emissions data provided by our suppliers. In cases where a supplier could not provide us with emissions data related to their products or services, we instead relied on public data derived from specialized databases (e.g. Ecoinvent, DEFRA), Type III Environmental Product Declarations (EPDs) or scientific publications.

In 2023 we revised our base assumptions for individual **Scope 3** categories and improved our calculation methodology. We expanded the catalogue of purchased services covered under Category 1 and calculated the corresponding emissions. We also included two additional categories: Category 8 – Upstream leased assets (emissions from leased storage space) and Category 12 – End of life treatment of sold products.

We furthermore adjusted our calculation for 2022, in line with the new assumptions concerning, among others, Category 1 (to which we transferred digital services related to distribution of games) and Category 9 (where only physical distribution of products, the cost of which is borne by customers, is considered).



In calculating **Scope 3** emissions for domestic member companies of the CD PROJEKT Group the following categories were taken into account:

- **Category 1:** Purchased goods and services⁴⁰, i.e. emissions from production of goods and services purchased by Group member companies. This category also includes emissions which carry the greatest contribution to the Group’s overall carbon footprint, i.e. emissions related to online distribution of games by GOG with the use of CDN services;
- **Category 2:** Capital goods, i.e. purchased fixed assets whose useful economic life lasts for at least several years. This category also includes emissions from construction of our new office building, which commenced in May 2023;
- **Category 3:** Fuel- and energy-related activities not included in Scope 1 or Scope 2, i.e. emissions from production and distribution of electrical energy and transport fuels – here, we relied on actual usage reports related to Scope 1 and 2, and on emissions indicators published by DEFRA and KOBIZE;
- **Category 4:** Upstream transportation and distribution, i.e. emissions from transportation of resources and of finished products whose costs are borne by Group member companies;
- **Category 5:** Waste generated in operations of CD PROJEKT Group member companies,

including transport and utilization of waste, and wastewater discharged to the sewer system. Following analysis emissions covered under this category were deemed immaterial for the CD PROJEKT Group (less than 2 tCO₂e per annum);

- **Category 6:** Business travel of Group employees, including emissions from the associated transport and accommodation;
- **Category 7:** Employee commuting, including emissions produced by remote work;
- **Category 8:** Upstream leased assets (storage space);
- **Category 9:** Downstream transportation and distribution, i.e. transportation and distribution of finished products whose costs are not borne by any member company of the Group;
- **Category 10:** Processing of sold products – not applicable to the CD PROJEKT Group;
- **Category 11:** Use of sold products (CD PROJEKT games), which includes direct emissions (Scope 1 and 2 for end users) and indirect emissions, e.g. from consumption of electrical energy required to operate the product;
- **Category 12:** End-of-life treatment of sold products. Following analysis, emissions covered under this category were deemed immaterial for the CD PROJEKT Group (less than 1 tCO₂e per annum);
- **Category 13:** Downstream leased assets, i.e.

office space leased to external entities at the Group’s Warsaw campus. This calculation acknowledges greenhouse gas emissions resulting from consumption of electrical and thermal energy by lessees, and leakage of coolant agents from air conditioning devices throughout leased space;

- **Category 14:** Franchises – not applicable to the CD PROJEKT Group;
- **Category 15:** Investments (mainly concerning investors and companies which provide financial services) – not applicable to the CD PROJEKT Group.

Through subsidies for the purchase of sustainable aircraft fuel, we have achieved an offset of 2.83 tCO₂e emissions from air travel in 2023.

⁴⁰Physical products intended for sale, marketing materials, office supplies, foodstuffs, tap water.
⁴¹Bought-in services subdivided into categories: programming, advertising, marketing, services related to preparation of promotional graphics, models and videos, participation in fairs, events and conferences, tests and QA, licensing, advisory services, services related to artistic activities, dubbing and IT (CDN provider services, cloud platforms, colocation of servers).
⁴²Carbon footprint from construction of the new office building covers: emissions from transportation and use of construction materials, use of consumables and fuels, waste generation.



Scope 3 – other material indirect GHG emissions	2023 emissions market-based [tCO ₂ e]	% of Scope 3 emissionsin 2023	2022 emissions market-based [tCO ₂ e]	% of Scope 3 emissions 2022
Cat. 1. Purchased goods and services	208 368	62.01%	129 540	72.53%
Cat. 2. Capital goods	3 944	1.17%	324	0.18%
Cat. 3. Fuel and energy-related activities	369	0.11%	323	0.18%
Cat. 4. Upstream transportation and distribution	24	0.01%	225	0.13%
Cat. 6. Business travel	582	0.17%	514	0.29%
Cat. 7. Employee commuting	271	0.08%	247	0.14%
Cat. 8. Upstream – leased assets	12	0.00%	14	0.01%
Cat. 9. Downstream transportation and distribution	87	0.03%	54	0.03%
Cat. 11. Use of sold products	121 800	36.25%	46 328	25.94%
Cat. 13. Downstream – leased assets	542	0.16%	1 042	0.58%
Total:	335 999	100.00%	178 611	100.00%

With regard to emissions, the most important categories are Category 1: Purchased goods and services (62% of Scope 3 emissions), where the main contributor is digital distribution of products on the GOG platform, and Category 11: Use of sold products (approximately 36% of Scope 3 emissions), which includes estimated emissions from use of electrical energy when playing our games (Cyberpunk 2077, Phantom Liberty and The Witcher 3: Wild Hunt). For Cyberpunk 2077 and Phantom Liberty emissions were calculated on the basis of detailed telemetry. For The Witcher 3: Wild Hunt emissions were estimated on the basis of limited telemetry. Figures reported for 2022 are based on data related to use of Cyberpunk 2077 only.

The reported increase in 2023 compared to 2022 is mainly due to an increase in the volume of data transmitted by GOG in the course of online distribution of products (Category 1), inclusion of emissions related to use of The Witcher 3: Wild Hunt in Category 11, inclusion of emissions related to bought-in services (eg. programming, advertising, marketing, QA) in Category 1 and inclusion of emissions related to construction of a new office building and acquisition of fixed assets (eg. construction of parking lot) in Category 2.

CD PROJEKT Group’s 2022-2023 carbon footprint

Scope	LB emissions (location-based) [tCO ₂ e]		MB emissions (market-based) [tCO ₂ e]		% share in total emissions	
	2023	2022	2023	2022	2023	2022
1	28	25	28	25	0.01%	0.01%
2	1 911	1 644	1 941	1 686	0.57% (LB) 0.57% (MB)	0.91% (LB) 0.93% (MB)
3	335 999	178 611	335 999	178 611	99.43% (LB) 99.42% (MB)	99.07% (LB) 99.05% (MB)
1 + 2 + 3	337 938	180 280	337 968	180 322	100%	100%

The CD PROJEKT Group’s 2023 carbon footprint was 337 938 tons CO₂e (location-based method) or 337 968 tons CO₂e (market-based method). The largest contribution to this figure is from **Scope 3**, which accounts for almost 99% of the Group’s aggregate carbon footprint.

Calculation of greenhouse gas emissions forms the foundation upon which the Group devises its carbon footprint management strategy for the coming years. We intend to focus on further improving our energy efficiency and increasing the share of renewable energy in the Group’s overall energy balance, among others by expanding our own renewable energy infrastructure.



Environmentally friendly campus

In 2023 we increased the number of solar panels at CD PROJEKT's Warsaw campus. Currently, 400 solar panels are deployed on rooftops, with an aggregate peak capacity of 135 kWp. In 2023 this array generated a total of 109 MWh of electrical energy (392 GJ), preventing the release of 75 tons of CO₂ equivalent into the atmosphere.

In 2022 and 2023 we proceeded with the construction of a multistory parking lot, with an open-air work and meeting area, combined with a green relaxation zone, on the rooftop. The parking lot was officially opened in Q2 2023. It incorporates a range of eco-friendly solutions, such as:

- a rainwater recuperation system where the collected water is used to water our plants, thus reducing our reliance on municipal water supply;
- 20 electric car charging stations; additionally, all parking spaces support future deployment of additional charging stations;
- setting aside part of the parking structure for the needs of cyclist commuters;
- creating a green area with 4.8 thousand potted plants lining the building's facades and dispersed throughout its grounds.





A major ongoing investment at the Warsaw campus is the construction of a new office building, coupled with reclamation of the surrounding areas. This work began in 2023. The building incorporates many eco-friendly solutions; its main structure is based on a steel-concrete framework, with glued laminated timber elements. Load-bearing components are made using low-emissions concrete, while the rebar is 90% recycled steel. Steel construction elements are also made with low-emissions recycled steel, produced using 100% renewable energy sources. Green spaces will provide added value to the project – facades of the office building will be lined with glass and girdled by large terraces, with plenty of plantlife. These will be accessible from all internal spaces and office areas. Large, openable windows will let in daylight while direct access to fresh air will assist in natural ventilation. Moreover, internal offices will be equipped with a modern, efficient air condition and ventilation system utilizing coolant agents which have a low impact on the ozone layer and do not exacerbate the greenhouse effect. Owing to a freecooling system, which makes use of outside air to provide air conditioning in favorable weather conditions, energy requirements will be reduced. Recessed balconies will help mitigate excessive exposure to sunlight and heating of interior spaces. Rainwater will be collected – to a substantial degree – and used to water plants and flush toilets. Electrical energy will be partially provided by solar panels incorporated into the building's structure.

Team commitment to helping the environment

Less Emissions with Red eco-friendly commuting initiative – vol. 2

In 2023 we organized the second edition of our low-emissions commuting program called “Less Emissions with Red”. This time the campaign also included additional emissions-free means of transportation. Participants could opt to commute by bike, by rollerblades or on foot. 178 of our team members took part in the challenge which lasted from May to September 2023, logging a total of 4 768 commutes and covering over 29 000 km. Opting for eco-friendly means of transportation prevented the release of approximately 3.9 tons of CO₂ compared to commuting by car equipped with an internal combustion engine.

Clothing swap

To promote a closed-loop economy and circular fashion, in September 2023 we organized a clothing swap. Team members could bring to the office any apparel and accessories which they no longer use, and pick up apparel brought by other participants. Unclaimed items were donated to Fundacja Ubrania do Oddania, with a cash donation made to Fundacja Ocalenie for each kilogram of clothing items. Overall, we turned over 65 kg of clothing, preventing emission of 846 kg CO₂.

Eco-awareness

In January 2023 we organized a webinar devoted to eco-friendly eating habits. Attendees were shown, among others, how to avoid wasting food. In April we published “Eco Guide - how to save the environment and energy”, which was made available for our employees and lessees. We also published a list of useful guidelines titled “How to be eco while traveling”. In June, at our company picnic, we organized an eco workshop, which included a well attended eco-friendly cosmetics manufacturing station. Throughout 2023 we also carried out a campaign which encouraged our team members to conserve energy.

GOG BEST PRACTICE



To celebrate Earth Day GOG team members devoted their time to “green” grassroots initiatives – such as a plant potting session. Employees who took part in this workshop learned how to care for potted plants, and had the opportunity to try their own hand at potting them. Another notable initiative involved transforming one of our meeting rooms into a “Jungle Room”, with employees banding together to create a new green zone for their meetings or individual work. The room is furnished with green upholstery and pillows, an abundance of plantlife and moss walls.



Datacenter management

At CD PROJEKT we store data in our own server infrastructure (deployed on premises or collocated at specialized facilities), as well as in global cloud infrastructures (including Google Cloud Platform, AWS, OVH or Atman Cloud).

Servers located at the Company’s Warsaw campus are powered by electrical energy purchased from the distributor who serves the entire CD PROJEKT campus, and also by energy generated by our own solar power array. Public cloud providers use – in whole or in large part – renewable energy sources, or have plans in place to cover their current energy needs with 100% renewable energy in the coming years. Servers located outside of

the Company’s premises, under a collocation agreement with Atman, are powered from renewable energy sources (since 1 January 2023), based on contracts concluded between the datacenter operator and energy distributors.

In 2023 we upgraded key components of the IT infrastructure deployed in the server room at CD PROJEKT’s Warsaw campus. This resulted in a major decrease in the quantity of deployed equipment, coupled with a near-two-fold increase in performance and a reduction in electrical energy consumption by 2.8%.

Our computing resources are virtualized and/or containerized, and through the use of automatic scaling mechanisms for selected external and internal services,

the computing power is directed to where it is needed most at the moment. Promotional activities or entire campaigns carried out on our GOG.COM distribution platform are partially or fully supported by additional computing resources procured from the above-mentioned public cloud providers, as well as by our own resources which are not used at the given time – this guarantees a high resource utilization ratio. In daily tasks and whenever there is increased activity related to the development of game or application code, resources are dynamically allocated on demand.





Our approach to climate risks and opportunities

In accordance with TCFD⁴³ guidelines we have identified climate-related risks and opportunities faced by CD PROJEKT in two distinct climate change scenarios and under three different time horizons.

TCFD recomendation	Implementation
Identifying the short-, medium- and long-term perspectives	<ul style="list-style-type: none">■ Short-term perspective – by 2025■ Medium-term perspective – 2025 to 2030 (based on EU medium-term climate goals)■ Long-term perspective – 2030 to 2050 (based on EU long-term climate goals)
Analysis involving two scenarios, one of which posits an increase in global temperatures by 2°C or less	Risks have been assessed in the context of two climate change scenarios: RCP ⁴⁴ 2.6 and RCP 8.5

Internal workshops devoted to analysis of respective scenarios were attended by representatives of CD PROJEKT teams whose activities exert the greatest impact on the climate and the environment. During these workshops we determined the impact and likelihood of materialization of each identified physical risk as well as for each transformational risk related to climate change. Risks were assessed in accordance with two scenarios: RCP 2.6

(which assumes an average increase in temperatures by 1.5°C compared to the preindustrial period – in line with the aspirational goal of the Paris Agreement), and RCP 8.5 (maintaining the current rate of increase of GHG emissions under the “business as usual” formula; in this scenario average temperatures will increase by 4.5°C compared to the preindustrial period, leading to irreversible destabilization of the Earth’s climate).



⁴³Taskforce for Climate-related Financial Disclosures.
⁴⁴Representative Concentration Pathways (RCP) have been accepted by the Intergovernmental Panel on Climate Change. They concern ranges of future changes in anthropocentric climate change drivers. In each scenario, the anticipated emissions depend on socioeconomic factors, degree of mitigation, climate change and reduction in air pollution.



Base scenario	Alternative scenario
RCP 2.6 – 1.5°C temperature increase	RCP 8.5 – 4.5°C temperature increase
Greater likelihood and scale of medium- and long-term transformational risks: <ul style="list-style-type: none">■ Meeting EU emissions reduction goals defined for 2030 and 2050■ Poland adopts and meets the goal of achieving climate neutrality, or achieves it with a minor delay■ Significant increase in the cost of energy■ Significant increase in energy prices■ Significant increase in ecological awareness on the part of consumers; greater demand for low-emissions products■ Fastest-ever increase in the efficiency of renewable energy technologies	Lower likelihood and scale of medium- and long-term transformational risks: <ul style="list-style-type: none">■ Failure to meet EU emissions reduction goals defined for 2030 and 2050■ Poland does not implement the goal of achieving climate neutrality, and instead significantly deviates from this goal■ Moderate increase in emissions-related costs■ Gradual and moderate increase in energy prices■ Significant increase in ecological awareness on the part of consumers; greater demand for low-emissions products■ Slower than expected increase in the efficiency of renewable energy technologies

The presented analysis covers 29 physical risks (16 persistent risks and 13 acute risks) as well as 4 categories of transformational risks: regulatory risk, market risk, technological risk and risk associated with loss of reputation. The following list presents risks which apply to CD PROJEKT regardless of the likelihood of materialization.



SUMMARY OF THREATS RELATED TO CLIMATE CHANGE							
			Likelihood of occurrence by 2025	2026 – 2030		2031 – 2050	
				RCP 2.6	RCP 8.5	RCP 2.6	RCP 8.5
Physical	Acute	Floods	low	=	=	=	↑
		Power outages caused by extreme weather events	high	=	=	=	↑
		Heat waves	high	=	=	=	↑
Transformational	Market	Energy price increases	moderate	↑	=	↑	↑
		Need to raise product prices due to energy price increases	low	=	=	=	=
	Regulatory	Increased financial burden related to introduction of EU climate regulations	low	↑	=	↑	=
		Increased disclosure requirements related to climate issues	moderate	↑	=	↑	=
		Penalties related to noncompliance with stricter environmental regulations	low	=	=	=	=
	Technological	Increased expenditures related to the need to upgrade equipment to meet elevated energy efficiency standards	low	↑	=	↑	=
		Reduced interest in energy-intensive games on the part of gamers	low	=	=	↑	=
		Increased costs related to changes affecting logistics and transport	low	↑	=	↑	=
		Loss of key technology partners due to non-fulfillment of their environmental and climate protection standards	low	↑	=	=	=
	Reputational	Loss of customers and investor interest due to unambitious approach to climate protection issues	low	↑	=	↑	=
		The Group’s pro-environment activities being branded as greenwashing	low	↑	=	=	=

= the likelihood of occurrence does not change from the level specified in the ‘likelihood of occurrence by 2025’ column

↑ the likelihood of occurrence increases from the level specified in the “likelihood of occurrence by 2025” column



In accordance with IPCC⁴⁵ guidelines regarding climate change, differences between both scenarios with regard to temperature increases by 2035 are negligible. Consequently, the likelihood of materialization of physical risks is similar in both cases, and becomes somewhat more likely by 2050 under the RCP 8.5 scenario. These conclusions have been validated in the case of Poland using a modeling tool operated by the World Bank⁴⁶ on the basis of IPCC predictions.

In analyzing the potential consequences of materialization of climate change risks it is important to consider the geographical location of CD PROJEKT’s Warsaw campus – in the Praga Północ district. This is where our offices and main server room are located, both of which may be susceptible to both chronic and acute effects caused by global temperature increases. In accordance with the provisions of the local climate change adaptation plan⁴⁷, Praga Północ is at an elevated risk for floods, and is within the Warsaw heat island, which translates into an increasing frequency of heat waves. Prolonged heat waves or other adverse weather events may cause interruptions in power supply. Workshops participants deemed the likelihood of materialization of this threat as “high”.

Key climate change threat faced by the CD PROJEKT Group

Threat	Our response aimed to ensure continuity of operations
Floods	<ul style="list-style-type: none">■ use of cloud services and collocation of own servers at other geographical locations■ reliable remote work model enabling tasks to be completed without being physically present at the office■ rainwater collection tank with a capacity of 72m³ located in the parking lot structure (another such tank, with a capacity of 160m³, will form part of our new office building, currently undergoing construction)
Heat waves	<ul style="list-style-type: none">■ air conditioning in all workspaces (in the design of our new office building, when considering air conditioning arrangements, an average summer temperature adjustment of +32°C was adopted in place of the +30°C norm – due to rapid climate change)■ window blinds providing physical protection from sunlight (in our new office building: recessed balconies to reduce excessive exposure to sunlight and heating of interior spaces)■ reliable remote work model enabling tasks to be completed without being physically present at the office
Intermittent energy supply	<ul style="list-style-type: none">■ auxiliary generator to power the server room during prolonged power outages■ reliable remote work model enabling tasks to be completed without being physically present at the office (employees are able to connect to a server powered by an auxiliary generator)

⁴⁵[IPCC report](#)

⁴⁶[Climate Change Knowledge Portal](#)

⁴⁷[Climate change adaptation strategy for the city of Warsaw by 2030, with an outlook for 2050](#)

Transformational risks have a higher likelihood of materialization in the RCP 2.6 scenario, particularly in the short and medium term, due to the need to take immediate action to ensure compliance with the Paris Agreement. The average likelihood of the materialization of such risks in the aforementioned scenario is assessed as “low/moderate”. The risks event regarded as the most likely to materialize include an increase in energy prices and, in the longer run, the need to face energy transformation. Such transformation on a national level may involve progressive phasing out of coal-fired power units at power plants, thereby increasing the likelihood of power outages – this affects both transformational and physical risks. In the RCP 8.5 scenario transformational risks have a lower likelihood of materialization, which is assessed as “low”.

Our response to the identified transformational risks is to continue to monitor the energy market along with changes in legal regulations, carry out training and educational campaigns targeted at our team, and seek external advice and audits.

Taking into account adaptational measures, whether already implemented or planned, we regard the impact of the materialization of transformational risks as not having a significant impact on the activities of our organization and business activities (i.e. their potential financial consequences are below the assumed materiality threshold). Expenses on adaptational measures are included in annual financial plans, and the implementation of such measures is described in the scope of our taxonomy-related disclosures.

The following climate opportunities faced by the CD PROJEKT Group were identified at the previously mentioned internal workshops:

- increased reliance on cloud solutions which are less energy-intensive than the in-house infrastructure currently used by CD PROJEKT,
- potential decrease in expenses as a result of improving the energy efficiency of buildings and devices operated at the CD PROJEKT campus in Warsaw,
- being regarded as the gaming industry leader in terms of climate-friendly approach to business,
- deploying eco-friendly solutions at new CD PROJEKT buildings (ongoing transformation of our campus, with construction of a modern office building having begun in 2023).

The above opportunities are most likely to materialize in the short and medium term in the RCP 2.6 scenario.

Managing climate risks

In line with TCFD recommendations, our adopted climate risk assessment methodology is based on longer-term predictions than for other types of risks. Climate-related risk is considered in our catalogue of strategic risks under the header “Risk related to protection of the natural environment and the climate”, and is monitored in accordance with our internal Risk Management Procedure described in the section titled “Managing sustainability-related risks”. Managing this risk is the responsibility of the VP for Oper-

ations (Risk Owner) while the person in charge of daily management activities (Risk Custodian) is the Environment and Climate Coordinator. We are in the process of determining key risk indicators (KRIs) for climate- and environment-related risks.

Climate-related risks and opportunities are subject to ongoing monitoring and annual reviews supervised by the CFO, who is also responsible for CD PROJEKT’s overall climate and environment policy. These reviews result in conclusions upon which further actions are taken by members of the ESG Management Group within their respective areas of responsibility.

08

TRANSPARENT RELATIONS





[GRI 3-3]

In emphasizing transparent relations in our daily work, we begin with ourselves. Transparent communication between team members forms an important aspect of our corporate culture, regardless of one’s place in the organizational structure. This concept is also reflected by our core values – “Be honest with everyone at all times” and “Be kind and respectful to all around you”⁴⁸.

The above-mentioned values guide us in building relations with gamers and business partners. In this section we focus on mechanisms which support transparent long-term external relations, as well as our actions taken in this scope in 2023.

Relations with the gaming community

[GRI 417-1]

Building engaged communities around our products

We communicated with gamers from around the world in eleven languages (English, Polish, Russian, German, French, Spanish, Japanese, Brazilian Portuguese, Korean, simplified Chinese and traditional Chinese) and have a presence on all major global social media platforms such as Facebook, X, Twitch and TikTok, as well as on their regional counterparts – such as Bilibili (China) or NaverCafe (Korea).

2023 was marked by the release of the Cyberpunk 2077 expansion – Phantom Liberty, the Ultimate Edition of Cyberpunk 2077 and the box set of The Witcher 3: Wild Hunt for next-gen consoles. Most of our communication activities

ESG ambition

Material issues

Goals for 2024

Sustainable Development Goals

Our team

Gamers

Ethics & Compliance

Gamers

Ethics & Compliance

Build relationships based on trust and transparency

Within our team, we build relationships based on mutual trust and transparency. For the sake of transparency in the Report, our approach to areas related to people employed in the “Our team” section.

- Building engaged communities around our products
- Implementing accessibility features in our games
- Responsible communication and marketing of products

- Transparency in relations with business partners
- Business ethics
- Management and protection of intellectual property
- Cybersecurity and data protection

- Adapt the company communication guidelines for engaging with the gaming community to suit the future project needs
- Develop standards for accessibility features in our future games
- Develop an internal accessibility standard in product communications

- Pilot the process of vetting key business partners
- Carry out a survey of employee awareness of whistleblowing rules and systems, with particular focus on SpeakUp! regulations
- Strengthen employee awareness of the principles for applying AI-based solutions
- Increase the team’s awareness of threats in the digital space through, among others, mandatory training for the entire team



⁴⁸More information about internal communication can be found in the “Our Team” section.

were carried out in support of these releases. Additionally, on 9-10 December our HQ hosted the final edition of the GWENT: The Witcher Card Game tournament, spectated by our team as well as by 70 guests representing the game's community. We took this opportunity to officially thank our fans and persons engaged in supporting GWENT over the recent years.

BEST PRACTICE



Between the announcement of the Phantom Liberty release date (12 June 2023) and the actual release (26 September 2023) the promotional campaign was based on materials showcasing the game's operation on all supported hardware platforms. Prior to the release we also published updated technical specs which we recommend for maximum enjoyment of the game. The promotional campaign was augmented by informational materials in several languages, detailing changes coming in Update 2.0 (released free of charge) as well as those available following purchase of Phantom Liberty. The pre-release game review campaign was carried out in accordance with market standards – representatives of major gaming media outlets and opinion leaders were provided with review keys for each platform supported by the game.



Player experience and safety

In 2023 a dedicated Player Experience and Safety team was set up at CD PROJEKT. The mission of this team is to ensure optimal gameplay experience and, in the future, build a user-friendly and safe environment in releases geared towards multiplayer gameplay.

The team’s tasks include, among others:

- gathering and analyzing player feedback,
- preparing informational content for players – e.g. by gathering information on upcoming changes, collating changelogs for update releases, explaining new features and changes in existing features or gameplay systems,
- cooperating with dev teams in the process of developing games and services to ensure that the resulting solutions are as transparent and user-friendly as possible,
- maintaining a support account on [X \(Twitter\)](#) along with an online [knowledge base](#), replying to frequently asked questions and sharing tips on dealing with common issues and errors,
- developing materials which help make informed purchases – eg. prior to the release of Cyberpunk 2077 Patch 2.1 – comparing existing and upcoming accessibility options.

In the future the Player Experience and Safety Team also plans to establish closer collaboration with game developers on solutions which promote safe and friendly online multiplayer environments, enable creation and enforcement of player codes of conducts, and ensure that adopted standards and safety recommendations regarding online gameplay are respected.

Product labeling
[GRI 417-1, 417-2, 417-3]

In our care for the safety of gamers we do our utmost to label the Company’s products appropriately, among others by doing the following:

- labeling games with an age-based rating suitable for the given territory (e.g. PEGI, ESRB). Information regarding each game’s rating is placed on its physical package, on a dedicated website, on selected marketing materials related to the game, and on its product sheet;
- putting in place photosensitivity warnings.

We also take action to restrict access to certain types of content related to the studio’s games for persons regarded as too young to access such content. This is done by adding age gates to dedicated websites and the studio’s product websites on digital distribution platforms.

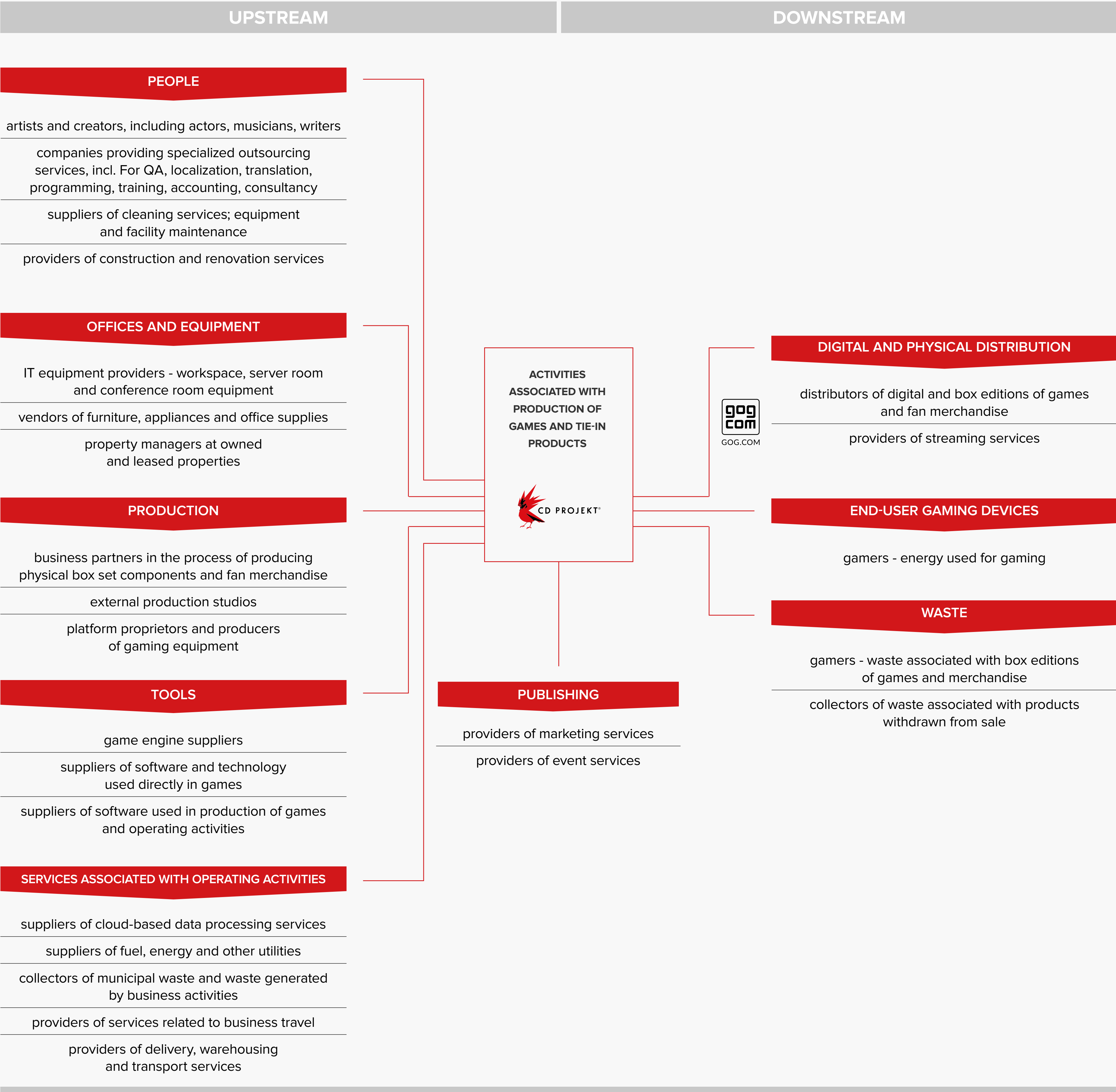
To the best of our knowledge, none of the following have occurred at the CD PROJEKT Group in 2023:

- incidents of non-compliance in marketing communications,
- incidents of non-compliance involving product and service information and labeling,
- incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling,
- incidents of non-compliance with regulations and voluntary codes concerning the health and safety impact of products and services at every stage of their life cycle.

Value chain

[GRI 2-6]

Developing large-scale story-driven RPGs is a process which requires cooperation with dozens of companies – both those which provide generic business services and those which represent the creative and artistic industries from around the world. We value longstanding business relations and reliable business partners. In our business we collaborate with actors, musicians, graphic artists, writers and translators – as well as with game distributors, producers of console platforms and computer equipment, software vendors, technology and game engine suppliers, external production studios (audio, motion capture) and providers of streaming services. Below we present an outline of the CD PROJEKT Group value chain.



Business relations

At CD PROJEKT establishing and maintaining relations with key business partners is the responsibility of the Business Development team. For its part, the Procurement team supports CD PROJEKT employees in purchasing products and services required in our daily activities. We are currently in the process of defining categories of key business partners along with the associated verification criteria.

No significant changes related to CD PROJEKT's main sector of activity occurred in the reporting period. With regard to markets on which the Company sells its products, CD PROJEKT upholds its earlier decision to suspend sales of CD PROJEKT Group products and games distributed on the GOG.COM platform throughout Russia and Belarus.

Business ethics

[GRI 2-23, 2-24]

Compliance management

Compliance management is an ongoing process at the CD PROJEKT Group. We try to gradually improve it and adapt it to regulatory requirements as well as the specific nature of our activities. In this scope, in 2023 we updated our Compliance Policy, which now also applies to other member companies of the CD PROJEKT Group. Compliance management at the Group is the responsibility of the Chief Compliance Officer. Compliance-related activities are coordinated by the Privacy & Compliance team – a distinct unit within the Company's legal department.

Internal regulations form an important part of our Compliance Policy. We take care to ensure that our regulations:

- remain clear and accessible to all employees,
- use simple phrasing, and are written and updated in line with legal design principles,
- are posted in the Company Intranet in both Polish and English.

Information regarding new regulations, or changes to existing regulations, is communicated to our employees in the form of internal newsletters.

In line with the Best Practices for WSA Listed Companies, the Management Board submits annual reports to the Supervisory Board, which cover the operation of the internal control system, risk and compliance management, and internal audit. The Supervisory Board subsequently applies to the General Meeting to approve annual reports which contain our assessment of the aforementioned mechanisms.

Business and Ethics Standards

A set of standards titled [Rules of the Game. Business and Ethics Standards at the CD PROJEKT Group](#) (“the Standards”) is in force at the CD PROJEKT Group. They explain which types of conduct are supported, and which ones are not tolerated – among others, in the context of human rights, privacy protection, compliance and whistleblowing. The Standards were formally enacted by the Management Board in 2021.

Fair Play – Code for Suppliers [GRI 2-6]

At CD PROJEKT we wish to promote responsible business practices, ethical employment conditions and sustainable growth. This is why in 2023 the Management Board enacted a set of regulations titled [Fair Play – Code for Suppliers](#). The code lists our commitments along with our expectations regarding our suppliers and their supply chains. It covers the following areas: ethics and compliance, human rights and environmental protection.

The code is currently provided to suppliers on an informational and non-binding basis.

Compliance training

CD PROJEKT organizes training courses, including e-learning courses, which – depending on topic – may be mandatory, voluntary or targeted at specific persons or teams.

The following training courses were organized in 2023:

Confidentiality and whistleblowing procedures:

- 121 participants; training organized in the framework of the onboarding process

SpeakUp! Whistleblowing policies:

- 109 participants; interactive e-learning sessions
- 9 participants; training for Trusted Persons

Counteracting corruption:

- 20 participants, training for selected teams

Personal data protection:

- 50 participants, training for selected teams
- 415 participants, interactive e-learning sessions

AI - aspekty prawne:

- 125 participants, training for selected teams
- 395 participants, open training course

Cybersecurity:

- 318 participants

Whistleblowing

[GRI 2-16, 2-25, 2-26, 406-1]

At CD PROJEKT we want to build a workplace where our declared values are observed on a daily basis, and it is important for us that each employee feels at ease. This is why in 2023 we developed a new policy, titled SpeakUp! Policy for Preventing Irregularities at CD PROJEKT S.A. This policy provides basic guidelines for reporting irregularities, rights and requirements related to whistleblowing, and responsibilities of all parties involved in this process.

With the adoption of the Policy we also updated specific whistleblowing procedures:

- procedure for counteracting undesirable conduct in employee relations (eg. mobbing, discrimination and harassment),
- procedure for reporting irregularities (such as legal violations or breaches of internal regulations or ethical norms).

Depending on the type of irregularity and the involved parties, notifications are received by the Chief Compliance Officer, a delegated member of the Management Board, a delegated member of the Supervisory Board, VP of HR or a Trusted Person. In the case of notifications which concern employees, follow-up investigations are carried out internally. With regard to notifications which concern the Chief Compliance Officer, a member of the legal team or a member of the Management Board, we refer to external experts in order to preclude any potential conflicts of interest.

Following an investigation, the Management Board (or the Supervisory Board, as appropriate) receives a final report. In its annual report on the performance of the internal control system, risk and compliance management, and internal audit, the Management Board provides the Supervisory Board with information regarding the number of reports received, types of irregularities alleged and follow-up actions taken.

Ways of reporting irregularities

For employees:

- internal forms providing the ability to submit anonymous notifications,
- in person,
- in writing.

For external parties:

- anonymized form available on the CD PROJEKT website,
- in writing to the Company’s address, marked: “Confidential: Compliance” or to the following email address: naruszenia@cdprojektred.com



BEST PRACTICE



Trusted Persons are elected by Company employees in a general, democratic ballot. Their main role is to receive notifications of alleged irregularities in employee relations, and to provide counseling and advice in this regard.

Every whistleblower is entitled to protection against potential reprisals. The same protection is accorded to witnesses and other persons providing assistance in reporting the irregularity. In each case we take action commensurate with the specifics of the given case. Investigations are carried out in accordance with the law, our internal regulations, confidentiality requirements and the need to ensure impartiality.

In 2023 we received a total of 18 notifications, including:

1. Improper conduct in employee relations

11 notifications of improper conducts were received in the context of 5 separate events:

- 1 event involving alleged sexual harassment,
- 4 events involving alleged conduct other than discrimination, mobbing or sexual harassment.

Special Investigative Committees were appointed in 3 cases; in the 2 remaining cases no further investigations were deemed necessary to uncover the relevant circumstances.

No cases of discrimination were identified at the CD PROJEKT Group in 2023.

2. Irregularities

In 2023 we received 7 notifications of alleged irregularities:

- 3 notifications concerning alleged infringement of information security standards,
- 1 notification concerning an alleged irregularity within the Company’s organizational structure,
- 1 notification concerning alleged irregularities in the procurement process,
- 2 notifications which were, on their face, baseless, and did not indicate any irregularity.

Following investigations in each of the above cases we did not find evidence of any actual irregularities. One investigation was still ongoing at the end of the reporting period.

Even though no irregularities were identified during the reporting period, we take care to conclude each investigation with a set of recommendations which aim to further minimize the likelihood of future occurrence of such irregularities.

Human rights

At CD PROJEKT we do not condone any form of discrimination, abuse, harassment or repression. This applies to CD PROJEKT Group employees as well as to persons who take part in our recruitment process, gamers, business partners and the local community.

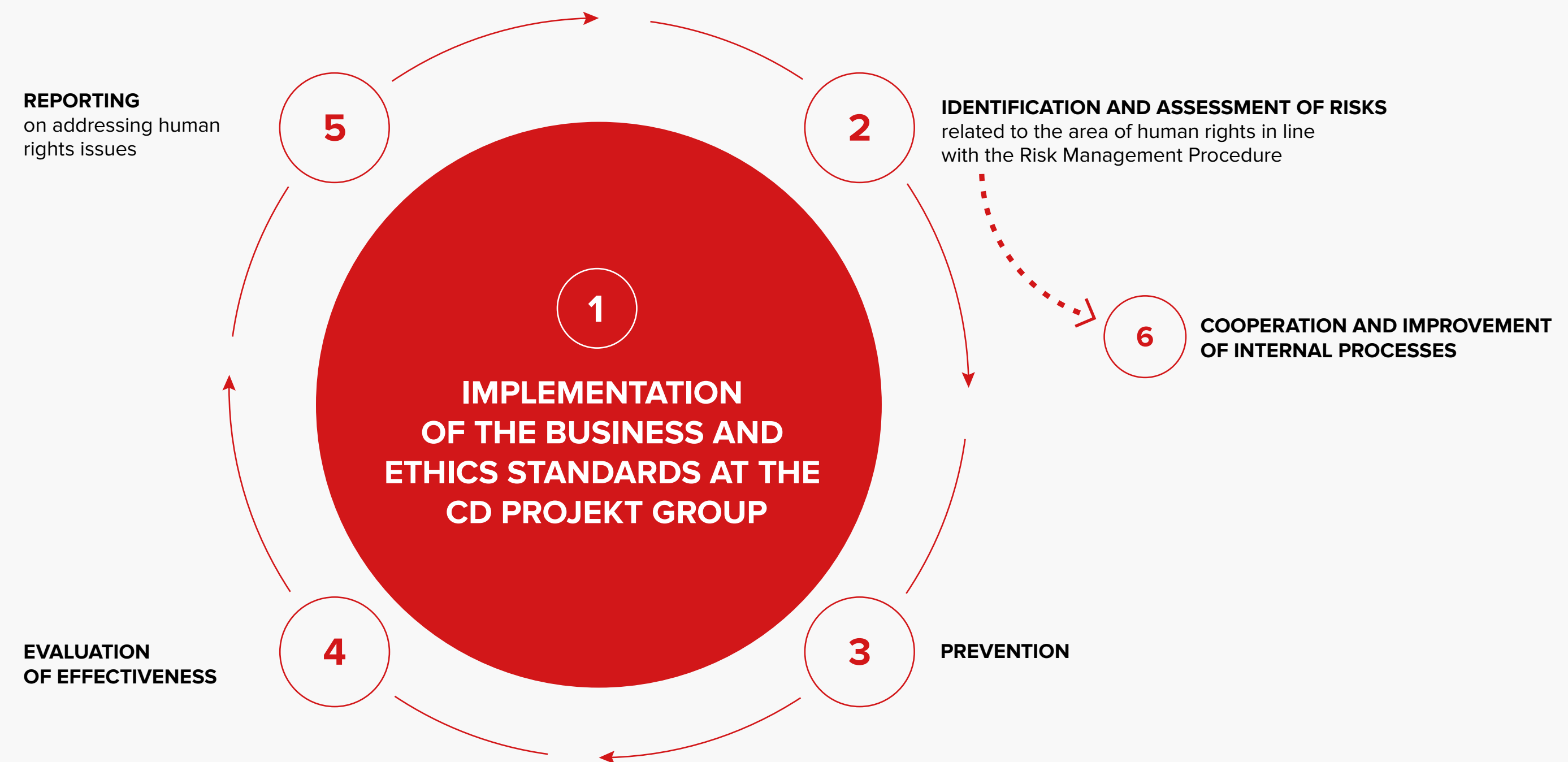
We act in compliance with international standards, including the Universal Declaration of Human Rights and UN Guiding Principles on Business and Human Rights. We apply due diligence in matters related to human rights by following the six-step approach proposed by OECD (Organisation for Economic Cooperation and Development).

Our human rights policy is part of [Rules of the Game. Business and Ethics Standards at the CD PROJEKT Group](#) as well as our [Diversity and Inclusion Strategy](#), adopted in 2023.

Visit our [website](#) to learn about best practices which we observe in the scope of human rights.



Illustration of the human rights due diligence process at CD PROJEKT Group



Prepared based on the OECD Due Diligence Guidance for Responsible Business Conduct.

Anti-corruption policy

[GRI 205-1, 205-2, 205-3]

In 2022 we formally adopted an [Anti-corruption Policy in CD PROJEKT Group](#), which contains basic guidelines on how to recognize, prevent and mitigate the risk of corruption in our business activities and in our dealings with public bodies.

“Zero tolerance” principle in all matters related to corruption

The [Anti-corruption Policy](#) specifies rules applicable to giving and accepting gifts, conflicts of interests, and third-party relations. It sets forth our standards of conduct, which includes our pledge to:

- maintain our accounts in a diligent, accurate, verifiable and timely manner,
- disburse payments in accordance with the law and our internal financial control standards,
- maintain transparency in our recruitment process,
- screen the beneficiaries of our charitable activities.

Thus far the Company has not carried out an analysis of the risk of encountering corruption among our business partners. Similarly to preceding years, no instances of corruption were reported in 2023.

Our anti-corruption training focuses on building awareness among employees on the basis of practical examples and storytelling. In 2023 members of the Procurement, Business Development, Administration and IT departments participated in anti-corruption training sessions.

Compliance with international regulations and fair competition

[GRI 2-27, 206-1]

As the CD PROJEKT Group we operate globally, supplying products and services to users across the globe. Our internal Legal Department, among others, provides opinions on concluded contracts, verifies legislative processes and cooperates with external law firms (domestic and foreign) in order to ensure compliance of our efforts with the legal regulations in force in various countries.

In business relations we do not take advantage of unfair advantages stemming from our market position, while as part of the commercial transactions we execute, we include the pertinent declarations of our status as a large corporate undertaking.

To the best of the our knowledge, in 2023:

- no fines or non-monetary sanctions for non-compliance with laws and regulations were imposed upon our Company,
- no legal steps concerning incidents of breaches of the principles of free competition or monopolistic practices were taken against us,
- no financial losses were incurred asa result of litigation due to unfair competition.

In the framework of the 2021 case pending before the US District Court for the Central District of California, on 27 January 2022 we announced that we had been notified of a formal Stipulation Agreement concluded with the law firm representing holders of securities traded in the USA under ticker symbols “OTGLY” and “OTGLF” and based on CD PROJEKT shares. Subsequently, on 28 November 2023 we announced that we had received notification of final approval of the aforementioned settlement agreement. This concludes the court proceedings concerning the class action lawsuit brought in the USA against the Company and other respondents. Further information about the court proceedings and conditions of the settlement agreement can be found in the [Management Board report on CD PROJEKT Group activities in 2023](#).

Intellectual property

The intellectual property rights vested in CD PROJEKT are primarily related to the universe of “The Witcher” and “Cyberpunk”. For each of them CD PROJEKT S.A. has acquired intellectual property rights beyond the games field, which facilitates the development of our IP in areas other than just video games.

Creation and protection of intellectual property are the cornerstones of our activity; that is why in the framework of our activities we incessantly tend to the rights held by CD PROJEKT. Each of our video games consists of many different elements – including software, graphics, animation, sound effects and storylines. Each one of them, taken individually and as a whole, constitutes intellectual property. The dedicated Business & IP team operating as part of CD PROJEKT’s Legal Department is responsible for the protection and management of intellectual property rights.

Within the framework of the Business & IP team:

- we ensure that each element of intellectual property created by CD PROJEKT receives the appropriate legal protection. As part of this area, we register trademarks and other rights subject to registration, and we ensure that we acquire full copyright from artists,
- we deal with the sublicensing of the intellectual property rights vested in CD PROJEKT, i.e. to numerous marketing and merchandising partners,
- we are responsible for ensuring that the content created by CD PROJEKT does not infringe upon

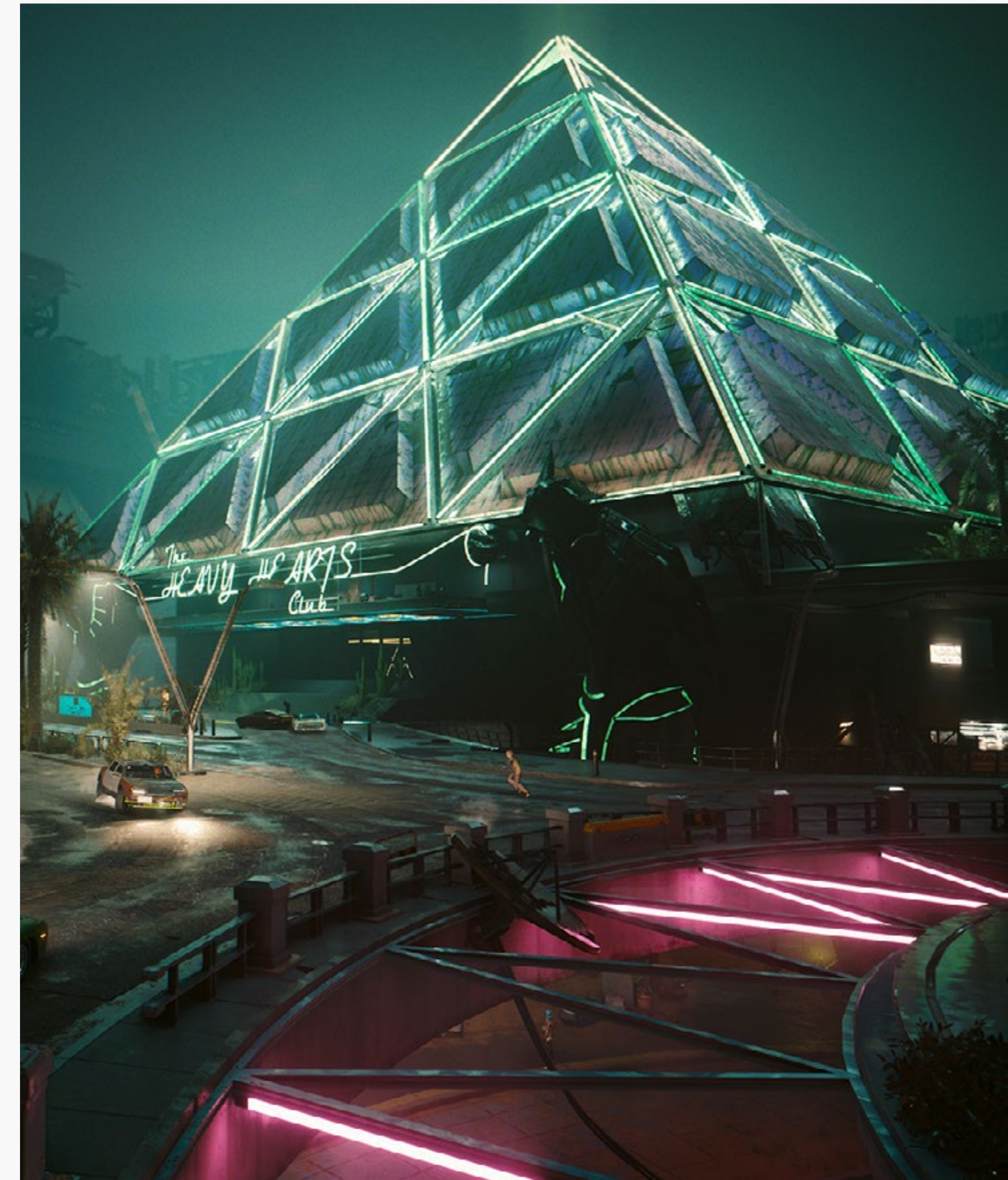
third-party rights, among others, by entering into the pertinent agreements, including licensing agreements or investigating the risk of violating trademark rights,

- in situations where the bounds of acceptable use of CD PROJEKT’s IP are violated, or when our IP rights are otherwise infringed, we take legal action to protect our IP rights,
- we analyze, including from a legal standpoint, emerging technologies and tools which may in the future assist in the video game development process – such as systems based on generative AI.

BEST PRACTICE



At CD PROJEKT we want to give the gaming community the ability to become inspired by our products by supporting the process of creating content based on our games. For instance, we have adopted a set of [Fan Content Guidelines](#) that make it possible to create fan content for non-commercial purposes.



Personal data protection

[GRI 418-1]

Activities involving personal data protection are pursued at CD PROJEKT on the basis of the CD PROJEKT Group's Personal Data Protection Policy ratified and implemented in 2018. The Privacy & Compliance team is responsible for enforcing and updating this policy. CD PROJEKT's activities in the scope of personal data protection are monitored on an ongoing basis by an external Data Protection Officer contracted by the Company.

Personal data protection at CD PROJEKT:

- in accordance with existing regulations, we process personal data only in the necessary scope, justified by clearly communicated goals,
- we always notify persons to whom the data pertains of the reasons and legal basis for processing of their data, and also of their rights in this regard,
- when selecting subcontractors who may obtain access to personal data, we make sure that they are able to provide an appropriate level of security for the data entrusted to them,
- we monitor, on an ongoing basis, the security of the personal data we process, and we act upon reports concerning possible security violations, when required, we report personal data security violations to the appropriate public bodies, and also notify persons to whom the data pertains.

To the best of our knowledge, in 2023 at CD PROJEKT Group:

- no leak, theft or loss of customer data was identified,
- no complaints were filed against CD PROJEKT with any institution responsible for personal data protection,
- CD PROJEKT did not incur any monetary losses related to litigation due to personal data protection,
- we did not receive any requests to divulge the data of CD PROJEKT users from the authorized public authorities.

Moreover, the following improvements were instituted at CD PROJEKT in 2023:

- we updated and simplified our Procedure to Design Privacy, which specifies our approach to new, planned solutions which will involve processing of personal data, so as to ensure that such data is processed in a secure and compliant manner,
- we rolled out a personal data protection e-learning course, available to all employees,
- we introduced RED Tips – short, periodic reminders of key matters related to privacy protection, cybersecurity and other procedures

in force at the Company, serving to increase awareness among employees,

- we carried out seven audits at selected departments, coupled with dedicated training sessions and recommendations – involving 50 of our employees,
- we updated and streamlined personal data protection clauses used in our dealings with business partners, employees and collaborators, as well as with people who visit our offices,
- we organized two training courses for Data Champions – dedicated Privacy & Compliance contact persons at individual departments of the Company,
- we enacted new rules for managing cookies on websites operated by the Company, improving compliance with requirements related to clarity and granularity of permissions granted by end users.

Cybersecurity

In 2023 we continued with our work on improving ways in which we manage digital information security.

With regard to cybersecurity, in 2023:

- we improved the work and effectiveness of our EDR system, in collaboration with its developer,
- we launched a new helpdesk center, with dedicated forms for reporting cybersecurity-related problems,
- we organized mandatory cybersecurity training for all employees,
- we organized additional training for team members identified within the Security Awareness program as particularly susceptible to attack,
- we took action to improve our team members' awareness of phishing campaigns,
- we redesigned and expanded our cybersecurity knowledge base which is available for all employees,
- we streamlined the process of handling cybersecurity and information security breach reports.

BEST PRACTICE



In keeping with the security obligations incumbent upon providers of software solutions, we carry out screening of contractors who may require access to our IT infrastructure or production data. This screening process involves analysis of risks associated with each partner, along with assessment of their security safeguards. We do not initiate collaboration with contractors who do not maintain our required level of security.

Tax transparency

[GRI 207-1, 207-2]

In discharging our fiscal obligations we exercise due diligence – we transparently provide all disclosures required under law, and we discharge our public law liabilities in a timely manner.

Guided by our fiscal security and social responsibility principles, we do not engage in activities which could be construed as tax evasion by relying on unlawful fiscal optimization or solutions which contravene the provisions or spirit of the law (principle of fiscal honesty). When making decisions which carry fiscal consequences, we exercise strong aversion towards fiscal risks. Final decisions in fiscal matters are based on analyses and recommendations provided by specialists from our internal tax and legal departments.

CD PROJEKT has instituted a set of internal policies and procedures which aim to ensure proper discharge of fiscal obligations and thus mitigate the associated risks. When in doubt regarding the interpretation of tax law, we submit requests for individual interpretations to the appropriate public tax authorities, or arrange consultations with external entities which provide consultancy services in this scope.

Maintaining control over implementation of our fiscal strategy, as well as over discharge of fiscal duties, is the responsibility of the Tax Department working in collaboration with CD PROJEKT's CFO.

We discharge public-law disclosure obligations concerning our tax strategy in a diligent and timely manner. Information

regarding our Tax Strategy for the given financial year is updated on an annual basis and published on our corporate website at www.cdprojekt.com.

09

SOCIAL ENGAGEMENT





[GRI 3-3]

CD PROJEKT Group takes action to positively affect its social environment, instill shared values in our employees, and assist others with our resources and skills. The Company engages in social projects, national charity drives and global aid campaigns through material donations, financial support and knowledge sharing. We also carry out projects targeted at the young generation, enabling participants to develop their skills and gain experience in the gaming industry.

In 2023 we donated a total of 880 thousand PLN⁴⁹ to charity. We supported, among others, the Serhiy Prytula Charity Foundation (with a donation earmarked for purchases of portable power generators for the civilian population of Ukraine), and we also facilitated the participation of a CD PROJEKT employee in the qualifying round of the Paris Paralympic Games in the wheelchair fencing discipline. The aforementioned figure also includes scholarships paid out to Girls in the Game! program participants.

Social engagement policy

[GRI 413-1]

In early 2024 the Management Board of CD PROJEKT adopted the Social Engagement Policy⁵⁰, which sets forth our approach to fostering positive social change. CD PROJEKT’s social engagement priorities include initiatives which benefit the gamedev industry as well as the local community. The document describes available forms of support, areas in which we wish to become engaged, as well as a catalogue of types of organizations with which we do not intend to cooperate.

Development of the Policy was preceded by a survey of our social engagement, which did not reveal any potential negative effect of our activities on local communities.

[Find out more](#) about our Social Engagement Policy.

Girls in the Game!

“Girls in the Game!” is the first scholarship and mentoring program in Poland dedicated specifically to female high school students, offering the opportunity to learn practical aspects of work in the gamedev industry and gain valuable experience under the supervision of our experts. The program is co-organized by CD PROJEKT and Fundacja Edukacyjna Perspektywy.

In February 2024 we wrapped up the second edition and launched the third edition of Girls in the Game! There is great interest in the program – the third edition attracted over 1000 applications from around Poland. Following a multi-stage recruitment process, we extended formal invitations to 20 exceptionally talented applicants.

Over the course of one year, our mentors – CD PROJEKT specialists – share their knowledge and professional experience with program participants. They also help their protégés gain self-confidence and plan further steps along their chosen path of professional development. Participants take part in workshops and events, and receive financial support (1000 PLN monthly) to finance further development and educational activities.

ESG ambition

Material issue

Goals for 2024

Sustainable Development Goals

Use our resources and competencies to support others

Involvement in social activities and cooperation with NGOs

- Pilot the employee volunteer program
- Implement at least 3 initiatives in the framework of our Social Engagement Policy

4 QUALITY EDUCATION

10 REDUCED INEQUALITIES

⁴⁹This figure is consistent with the value of the “Donations and charitable activities” line item in the Other operating costs section of CD PROJEKT Group’s consolidated financial statement for 2023.
⁵⁰Covering 84% of operations, calculated on the basis of percentage share in 2023 consolidated revenues.

Christmas charity events

A number of charity events were held in the run-up to the Christmas season. The auction of skills and joint activities offered by our team members again proved very popular – such activities included, among others, skateboard training, a photography workshop and a day trip to Kraków. Another grassroots initiative involved the creation and sale of a calendar featuring photos of CD PROJEKT team members' pets. We also organized a bake sale with cakes prepared by our team members. Altogether, our holiday charity events attracted over 500 people. We collected nearly 42 thousand PLN, which was donated to several foundations – Fundacja Ocalenie, Judyta Foundation for Pups, the Polish Humane Society (Ząbkowice Śląskie division) and the Kraków-based "Stawiamy na łapy" Pet Assistance Foundation.

Promised Land Art Festival

In 2023, together with the Municipality of Łódź and the "EC1 Łódź – Miasto Kultury" initiative, we organized the fifth edition of the Promised Land Art Festival. This annual event brings together hundreds of gaming enthusiasts, comic book aficionados and fans of visual arts, offering them the opportunity to meet with experts from the creative arts industry, and participate in workshops and lectures.

The list of speakers at the fifth edition of the festival included Michał Markiewicz, a celebrated artists who works, among others, on Pixar studio productions, as well as Masahiko Otsuka, director of the Japanese Trigger, Inc. animation studio which co-produced the Cyberpunk:

EDGERUNNERS anime series. The Promised Land Art Festival was also attended by representatives of CD PROJEKT, including Global Art Director Jakub Knapik and Quest Director Paweł Sasko.

The main part of the festival was preceded by an Open Day, targeted primarily at people who are on the cusp of their professional careers and are considering a career in the creative industry. In addition to attending discussion panels and lectures participants also had the opportunity to consult their portfolios with experts, and learn more about game development work from recruiters present at the venue.

BEST PRACTICE



We eagerly share our knowledge and experience, including at external events. In 2023 CD PROJEKT team members delivered talks at the following conferences: [Game Developers Conference \(San Francisco\)](#), [LeadDev \(London\)](#), [Gamescom Asia \(Singapore\)](#), [SXSW Conference \(Austin\)](#), [Digital Dragons \(Kraków\)](#) and [Game Industry Conference \(Poznań\)](#). We also familiarized broad audiences with the literary and cultural inspirations influencing *The Witcher* series at a series of events organized by the Copernicus Science Center in Warsaw.



Strategic partnership with Futuregames

In 2023 we entered into a strategic partnership agreement with Futuregames – a Swedish learning institution which specializes in training future gaming industry workers. Under this agreement we provide – on preferential terms – office space at our Warsaw campus where classes can be held. We also made a one-time financial donation to Futuregames, enabling it to lower tuition fees to a level which is appropriate for the Polish market. In September 2023 we launched three majors: game artist, game designer and game programmers, currently involving 45 people from around the world. Classes are organized by gaming industry experts, including CD PROJEKT employees who also benefit by gaining mentorship experience. Futuregames is also a partner of Epic, creators of Unreal Engine 5, which is used in the development of our games. As a result, Futuregames students can gain valuable skills which are in demand in the gamedev branch of CD PROJEKT. In the future we plan to organize internships for top un-

degraduates. Our strategic partnership with Futurgames has enabled us to create the first Polish school where gamedev experts play a part in shaping the curriculum. The school's academic council includes CD PROJEKT team members, the SPIDOR Association of Video Game Developers and Distributors, as well as representatives of People Can Fly and 11Bit Studios.

Local community support

In 2023 we initiated collaboration with a local childcare facility located in our neighborhood. "The House on Jagiellońska Street" provides day care for 14 children aged 4-18. Our support included renovation of the kitchen, and we also donated TVs, laptops, toys and holiday goodie bags. This equipment and facility upgrades will assist in the childrens' education, recreation and integration.

Another outreach activity involved providing Fundacja Ocalenie with office space to conduct a series of Polish

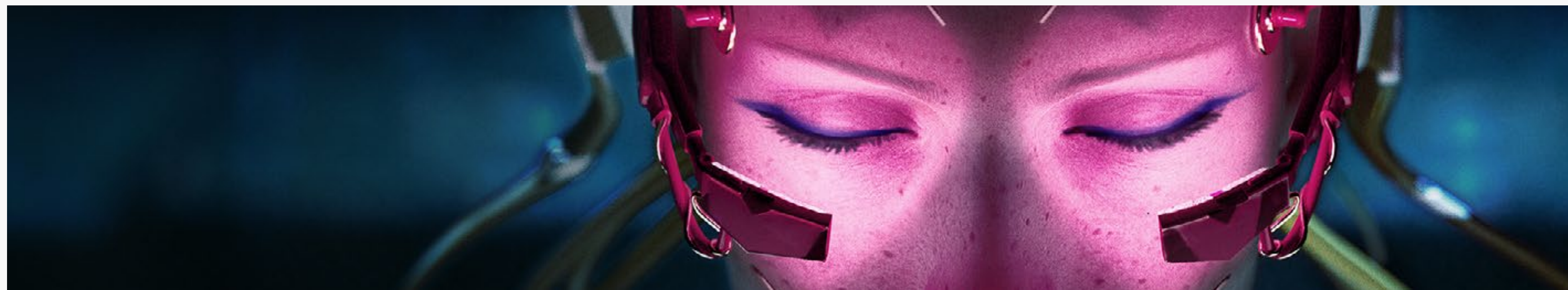
language classes for foreigners. These classes are primarily offered to persons obtaining asylum in Poland, immigrants from outside the EU and persons wishing to continue with their education. They are organized by unpaid volunteers who, while not being professional teachers of Polish, have received the appropriate training from representatives of Fundacja Ocalenie.

GOG BEST PRACTICE



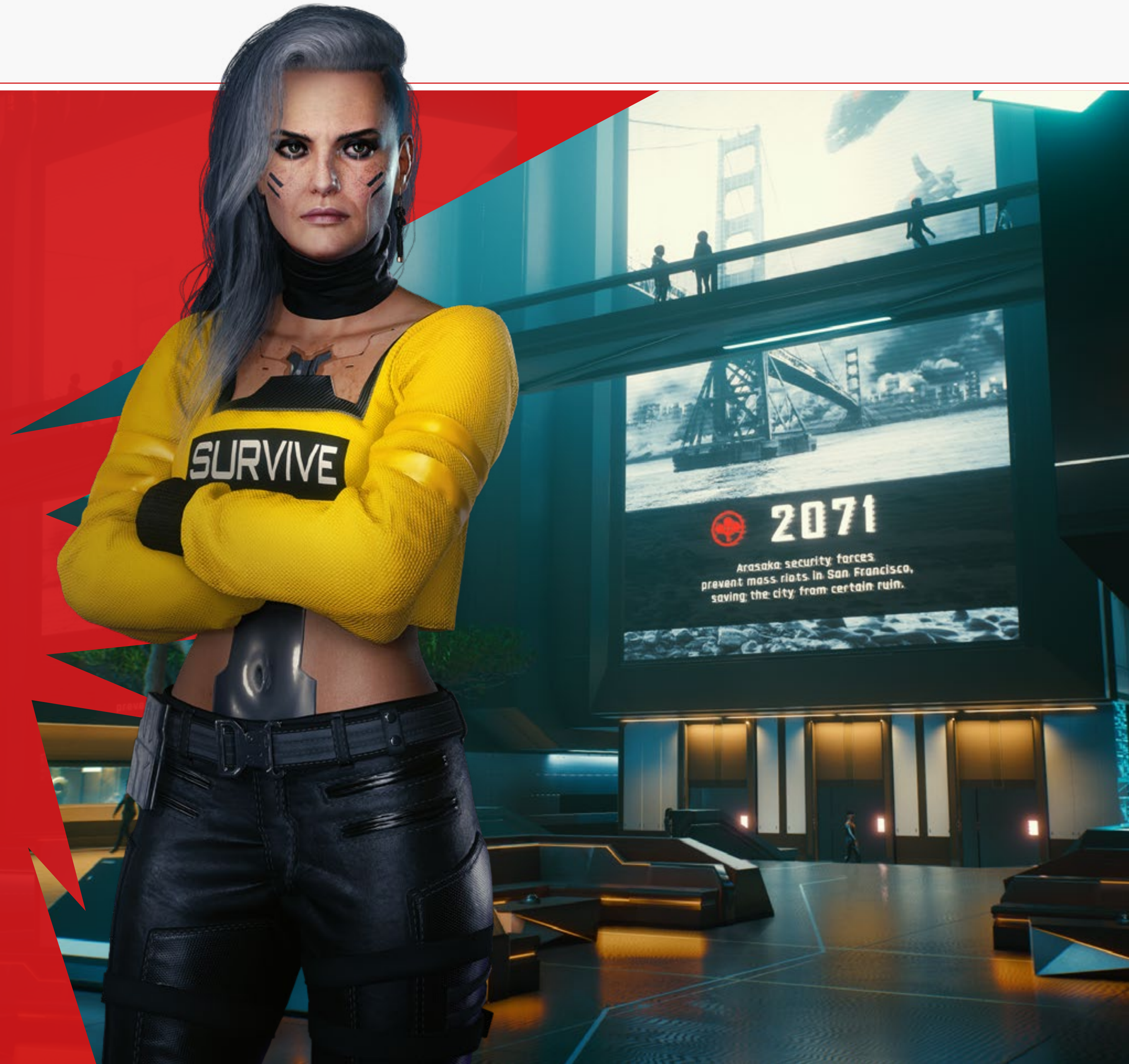
In June 2023, to mark the International Children's Day, GOG partnered with the Gamers Outreach Foundation which assists hospitalized children by giving them the opportunity to play video games during their hospital stay.

To assist and promote the foundation's charity work, an interview with its founder was posted on the GOG website. We also carried out a charity drive by offering charity game bundles for sale.



10

ATTACHMENTS





Attachment 1. Compliance with the Accounting Actwith regard to non-financial disclosures

Disclosure required under the Accounting Act	Internal reference
Description of the entity’s business model and key performance indicators	Our business
Description of management of risks identified as material	Managing sustainability-related risks
Description of policies, due diligence procedures and performance indicators related to the entity’s activities in the scope of counteracting corruption	Anti-corruption policy
Description of policies, due diligence procedures and performance indicators related to the entity’s activities with regard to respect for human rights	Human rights
Description of policies, due diligence procedures and performance indicators related to the entity’s activities with regard to social issues	Social engagement
Description of policies, due diligence procedures and performance indicators related to the entity’s activities with regard to the natural environment	Environment
Description of policies, due diligence procedures and performance indicators related to the entity’s activities with regard to labor issues	Our team
Description of policies, due diligence procedures and performance indicators related to the entity’s activities with regard to consumer/client relations and quality	Relations with the gaming community



Attachment 2. Compliance with EU Taxonomy for sustainable activities

Context

The UE Taxonomy provides a classification system for reporting what percentage share of the CD PROJEKT Group’s activities – based on revenues, capital expenditures (CapEx) and operating expenditures (OpEx) – is environmentally sustainable.

According to this framework, an activity is environmentally sustainable if it meets all of the following criteria:

- it contributes substantially to one or more of the environmental objectives,
- it does not significantly harm any of these environmental objectives,
- it is carried out in compliance with minimum safeguards,
- it complies with technical screening criteria.

The EU Taxonomy is structured around six environmental objectives:

- climate change mitigation;
- climate change adaptation;
- sustainable use and protection of water and marine resources;
- transition to a circular economy;
- pollution prevention and control;
- protection and restoration of biodiversity and ecosystems.

Technical screening criteria (TSC) are used to determine what constitutes substantial contribution to each objective and when a given activity does not cause significant harm. These are provided in Annexes I and II to Commission Delegated Regulation (EU) 2021/2139⁵¹, later amended by Commission Delegated Regulation (EU) 2022/1214⁵², concerning climate change mitigation, as well as Commission Delegated Regulation (EU) 2023/2486⁵³ concerning four other environmental goals.

Alignment of the CD PROJEKT Group’s activities with the Taxonomy for sustainable activities

Revenue and CapEx values were determined on the basis of the accounting principles described later in this chapter. Following analysis, we have determined that the following percentage of revenues and capital expenditures (CapEx) is aligned with the Taxonomy:

	Revenues [thousand PLN, %]	CapEx [thousand PLN, %]
2023 figure	1 232 770	325 711
Sustainable activities (Taxonomy-aligned)	81.3%	83.9%
Non-sustainable activities (Taxonomy-eligible but not aligned)	0.2%	9.2%
Neutral activities (Not eligible under the Taxonomy)	18.5%	6.9%

⁵¹ Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation of climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives.

⁵² Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.

⁵³ Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Commission Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.

The remainder of this section characterizes the process of assessing alignment with the Taxonomy, describes the applicable accounting regulations and provides a detailed overview of three performance indicators, along with tables consistent with the so-called Art. 8 delegated act; that is, Commission Delegated Regulation (EU) 2021/2178⁵⁴.

Information concerning assessment of alignment with the Taxonomy

The process of analyzing alignment with the Taxonomy was carried out with participation of the ESG team, with input from the internal control, reporting, administration and IT departments.

The process involved the following four steps:

Step 1: Identification

Based on activity descriptions listed in annexes to Commission Delegated Regulation (EU) 2021/2139 and Commission Delegated Regulation (EU) 2023/2486 the CD PROJEKT Group carried out a review of its 2023 activities – in the context of revenues and capital expenditures (CapEx) – and identified Taxonomy-eligible areas.

In 2023 we submitted a formal request for the European Commission to unambiguously clarify whether revenues

from sales of games, as well as CapEx related to development thereof, are Taxonomy-eligible under Activity 8.2 Computer programming, consultancy and related activities described in annexes to Commission Delegated Regulation (EU) 2021/2139. On 10 July 2023 we received an affirmative reply. In our 2022 disclosures we did not regard these revenues and CapEx as Taxonomy-aligned, which explains the significant year-on-year difference in our disclosures.

Step 2: Allocation

Subsequently, for each activity identified as Taxonomy-eligible, we determine the corresponding revenues and capital expenditures incurred by the CD PROJEKT Group in 2023. Details of the allocation methods are described in the section titled “Accounting principles” elsewhere in this chapter.

Step 3: Verification

Verification of eligibility is enabled by two types of assessment:

- 1. Assessment of compliance with Technical Screening Criteria

Compliance with Technical Screening Criteria (TSC) listed in annexes to Commission Delegated Regulation (EU) 2021/2139 and Commission Delegated Regulation (EU)

2023/2486 was analyzed for all Taxonomy-eligible activities. This analysis was performed with respect to each criterion specifying what constitutes substantial contribution and lack of significant harm, in order to determine whether the given activity is aligned with TSC.

- 2. Assessment of compliance with Minimum Safeguards

Compliance with Minimum Safeguards was assessed on the basis of recommendations provided in the Final Report on Minimum Safeguards published by Platform on Sustainable Finance. Minimum Safeguards are defined in Art. 18 of Regulation 2020/852⁵⁵ and based to a large extent on the requirement to exercise due diligence as defined in UN Guiding Principles on Business and Human Rights, and OECD Guidelines for Multinational Enterprises. Although the Platform on Sustainable Finance report is not legally binding, it nevertheless represents the sole available source of interpretations regarding Minimum Safeguards issued by an entity affiliated with the European Commission and appointed on the basis of Regulation 2020/852.

⁵⁴Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation.
⁵⁵Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.



Criterion	Verification method
1 Inadequate or nonexistent due diligence mechanisms with regard to human rights, anti-corruption measures, counteracting unfair competition or tax strategy.	Verification of due diligence procedures was performed by filling out an extensive form – based on the methodology proposed by Platform for Sustainable Finance (World Benchmark Alliance Core UNGP Indicators). This process revealed that due diligence processes are appropriately followed at the CD PROJEKT Group.
2 The Company is ultimately held liable or declared guilty of violating labor law or human rights in certain court cases related to labor law or human rights.	Verification was based on checking – in collaboration with persons responsible for Compliance and Internal Audit – whether no binding convictions had been issued with regard to the Company in matters related to human rights, corruption, fair competition and taxation. This process revealed that no such convictions had been issued.
3 The Company has refused to engage in dialogue with the OECD National Contact Point (NCP).	In 2023 the OECD NCP did not attempt to engage in dialogue with the Group; consequently, there was no room for refusal.
4 The Business and Human Rights Resource Centre (BHRRC) issued allegations regarding the Company, to which the Company did not respond within 3 months.	Querying the Business and Human Rights Resources Centre (BHRRC) ⁵⁶ database revealed that no activity concerning the Company had occurred between 1 January and 31 December 2023.

The aforementioned analysis indicates that CD PROJEKT Group activities in 2023 were consistent with Minimum Safeguards.

Step 4: Calculation

By applying the information obtained in the three preceding stages, we prepared tables concerning our revenues and capital expenditures, consistent with the Commission Delegated Regulation (EU) 2021/2178.

Accounting principles

When calculating the eligible fraction of revenues, capital expenditures (CapEx) and operating expenditures (OpEx) the following criteria were applied:

Revenues

With regard to revenue, the basis was the CD PROJECT Group’s revenue in 2023 as disclosed in the consolidated financial statement in Note 1. Sales revenue and Note 3. Other operating income and expenses - Rental income. The numerator represents revenues from activities regarded as eligible.

Capital expenditures (CapEx)

With regard to capital expenditure (CapEx), the basis was the capital expenditure accounted for in the individual consolidated companies of the CD PROJEKT Group. Capital expenditures are presented in the consolidated financial statement for 2023 in:

⁵⁶https://www.business-humanrights.org/en/companies/?company_name=CD+PROJEKT§or=&headquarters=&letter=#company_index_form

- Note 10. Statement of changes in property, plant and equipment - increase due to purchase;
- Note 11. Statement of changes in intangible assets and expenditure on development projects - increase due to purchase and assets generated internally;
- Note 13. Statement of changes in investment properties - increases due to capitalised expenditures.

The numerator represents investment expenditures related to activities regarded as eligible.

Operating expenditures (OpEx)

Regarding operating expenditures (OpEx), it was determined that these do not play a significant role in the Group’s business model; consequently, in line with section 1.1.3.2 of Annex I to Commission Delegated Regulation (EU) 2021/2139, this KPI was excluded from calculations and disclosure.

Supplementary information

Data used in calculations was drawn from the financial and accounting system operated by CD PROJEKT S.A. and from financial and accounting systems operated by other member companies of the Group which are subject to consolidation.

In the process of assigning revenues and investment expenditures to categories, the Group avoided double counting by applying the appropriate consolidation eliminations, in line with the applicable accounting regulations.

The presented analysis did not reveal any types of activity which would contribute to more than one environmental objective. Consequently, there was no need to apply special procedures to avoid double counting.

This report marks the second time the Group has revealed the share of Taxonomy-aligned activities in its overall activity profile, as well as the third time it has revealed the share of its corresponding Taxonomy-eligible activities. The disclosure provided in this report covers the previous financial year, i.e. the period between 1 January and 31 December 2023.

Analysis revealed that no detailed disaggregation of KPIs by the Group’s operating units is required, pursuant to item 1.2.2.3 of Annex I to Commission Delegated Regulation (EU) 2021/2178. Further information in this regard can be found in commentary sections attached to each KPI.

The CD PROJEKT Group does not conduct, finance or become exposed to the types of activity listed in sections 4.26-4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 (activities related to production of energy in nuclear processes or production of energy from gaseous fossil fuels).

Note regarding the “Percentage of aligned revenues” table

The Group’s consolidated revenues (as defined in Section 1.1.1 of Annex I to Commission Delegated Regulation (EU) 2021/2178) in 2023 amounted to 1232 770 thousand PLN, of which categories were Taxonomy-eligible:

- revenues from sale of video games (1 001 949 thousand PLN), which qualify for Activity 8.2 Computer programming, consultancy and related activities,
- revenues from leasing office space at buildings belonging to CD PROJEKT S.A. (2 571 thousand PLN), which qualify for Activity 7.7 Acquisition and ownership of buildings.

Revenues from Taxonomy-non-eligible activities (B)	228 250	18.5%
Total (A+B)	1 232 770	100.0%

Part of the Taxonomy-eligible revenues under Activity 8.2 was also compliant with TSC.

In 2023 the Group obtained 228 250 thousand PLN in revenues from activities not eligible under the Taxonomy (this amount includes revenue from services, goods and materials and revenue from non-gaming franchise projects).

The share of Taxonomy-eligible revenues in the Group’s total revenues for 2023 was 81.5% - with 81.3% of revenues identified as Taxonomy-aligned. The remaining 18.5% of revenues are regarded as non-eligible.

Note regarding the “Percentage of aligned CapEx” table

Taxonomy-eligible capital expenditures (CapEx) are related to implementation of investment plans adopted in the process of drawing up 2023 budgets by management boards of companies subject to consolidation. In 2023 the Group incurred 325 711 thousand PLN in consolidated capital expenditures. Taxonomy-eligible CapEx concerned mainly:

- development of games (246 611 thousand PLN); these expenditures are Taxonomy-eligible under Activity 8.2 Computer programming, consultancy and related activities as described in Annex II, and are compliant with TSC;
- construction of a new office building (15 592 thousand PLN), these expenditures are Taxonomy-eligible under Activity 7.1 Construction of new buildings as described in Annex II, and are compliant with TSC;

- construction of a car park at the Company’s headquarters (28 575 thousand PLN); the expenditure on this activity is eligible for systematisation under activity 7.1 Construction of new buildings in Appendix II;
- purchases of intangible and legal assets, including in the course of developing applications and software, and purchases of IT infrastructure (10 477 thousand PLN). These expenditures are eligible under Activity 8.1. Data processing, hosting and related activities as described in Annex II, and are compliant with TSC,
- upgrading existing buildings which belong to the CD PROJEKT Group (1 483 thousand PLN). These expenditures are eligible under Activity 7.2 Renovation of existing buildings, as described in Annex II

An additional capital expenditure of 110 thousand PLN was incurred in the expansion of our solar power array, which increases the percentage share of renewable energy sources in our overall energy supply, and helps reduce our greenhouse gas emissions.

In 2022 the Group incurred 22 489 thousand PLN in non-eligible capital expenditures.

The percentage share of Taxonomy-eligible CapEx in the Group’s total CapEx for 2023 was 93.1% - including 83.9% in Taxonomy-aligned expenditures. The remaining portion of capital expenditures (6.9%) is regarded as non-eligible

CapEx of Taxonomy-non-eligible activities (B)	22 480	6.9%
Total (A+B)	325 711	100.0%



Attachment 3. Numerical data

Employment figures

[GRI 2-7] Employees

Entity	Type of cooperation	Gender	Total
CD PROJEKT Group	Permanent employment contract	woman	246
		man	335
	Fixed-term employment contract	woman	10
		man	7

Entity	Type of cooperation	Gender	Total
CD PROJEKT Group	Full-time employment contract	woman	251
		man	337
	Part-time employment contract	woman	5
		man	5

Figures indicate number of persons employed as of 31 December 2023 on employment contracts. During the reporting period we did not employ non-guaranteed working hours employees. A significant event related to employees was the staff reduction announced in July 2023.

[GRI 2-8] Workers who are not employees

Entity	Type of cooperation	Total
CD PROJEKT Group	Other forms of employment contracts (creators and artists employed under civil law contracts and sole proprietors)	495

Figures indicate number of persons employed as of 31 December 2023. A significant event related to non-employee workers was the staff reduction announced in July 2023.



[GRI 2-21] Annual total compensation ratio

2023	CD PROJEKT S.A	GOG Sp. z o. o.
Ratio of the annual total compensation for the organization’s highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual)	27.65	6.87
Ratio of the percentage increase in annual total compensation for the organization’s highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual)	0.25	3.76

Calculations are based on CD PROJEKT Group employees who remained employed throughout all of 2023.

The total annual remuneration includes fixed salaries paid on a monthly basis, i.e. base salary, function bonus (applies to managerial positions), proxy and annual bonus (for 2022, paid in 2023).

[GRI 202-1] Ratios of standard entry level wage by gender compared to local minimum wage

2023	CD PROJEKT S.A	GOG Sp. z o. o.
Ratio of standard entry level wage of women compared to local minimum wage	1.36	1.11
Ratio of standard entry level wage of men compared to local minimum wage	1.36	1.11

All CD PROJEKT Group employees are paid above the minimum wage.



[GRI 205-2] Communication and training about anti-corruption policies and procedures

Employee category	Number of CD PROJEKT Group employees as of 31.12.2023	Number of employees and members of governing bodies who attended training and were informed of the anti-corruption policies and procedures applicable to their position	% of employees and members of governing bodies who attended training and were informed of the anti-corruption policies and procedures applicable to their position
Junior	39	1	3%
Specialist	238	8	3%
Senior	167	3	2%
Expert	18	0	0%
Lead	41	1	2%
Manager	44	2	5%
Director	51	1	2%
Management Board	7	0	0%
Supervisory Board	5	0	0%

CD PROJEKT Group’s anti-corruption policy was adopted in 2022 and has not been updated since. In 2023 we trained people employed from departments potentially most exposed to corruption risks – Procurement, Business Development, IT and Administration – on anti-corruption procedures. In future years we intend to continue organizing anti-corruption training for other teams which may be at risk for corruption.

In 2023 we began sharing our anti-corruption policy with business partners as part of our Fair Play. Code for Suppliers. By the publication date of this report we had provided it to 10 such entities.



[GRI 401-1] New employee hires and employee turnover

CD PROJEKT Group	Number of employees as of 31.12.2023	Number of new employee hires	% of new employee hires in a given group	Turnover – number of employees	Turnover – percentage
Women	256	36	14.1%	41	16.0%
Men	342	37	10.8%	55	16.1%
Total	598	73	12.2%	96	16.1%

CD PROJEKT Group	Number of employees as of 31.12.2023	Number of new employee hires	% of new employee hires in a given group	Turnover – number of employees	Turnover – percentage
<30	168	32	19.0%	31	18.5%
30-50	426	41	9.6%	65	15.3%
>50	4	0	0.0%	0	0.0%
Total	598	73	12.2%	96	16.1%

[GRI 401-3] Parental leave

CD PROJEKT Group	Woman	Men	Total
Total number of employees who took parental, maternity or paternity leave	19	23	42
Total number of employees who returned to work during the reporting period after the end of parental, maternity or paternity leave	9	21	30
Return-to-work rate of employees who took parental leave	90%	100%	



[GRI 404-1] Average hours of training per year per employee

Average number of training hours by gender in 2023	
Women	22.18
Men	23.14
Average number of training hours per category in 2023	
Junior	40.12
Specialist	17.28
Senior	24.55
Expert	18.76
Lead	22.46
Manager	31.89
Director	25.14
Average hours of training per year per employee	22.73

Figures for CD PROJEKT S.A., include holders of employment contracts.

[GRI 405-1] Diversity of governance bodies by employment category, by gender and age

CD PROJEKT S.A.	Percentage of Management Board members by age and gender			Percentage of Supervisory Board members by age and gender		
	Women	Men	Total	Women	Men	Total
<30	–	–	–	–	–	–
30-50	–	6	85.7%	1	3	80.0%
>50	–	1	14.3%	–	1	20.0%
Total % by gender	–	100.0%	7	20.0%	80.0%	5



[GRI 405-1] Diversity of employees by employment category, by gender and age

CD PROJEKT Group	Number and percentage of employees in each group in relation to the total number of employees at the organization by age							
	<30	30-50	>50	Total	<30	30-50	>50	Total
Junior	28	11	0	39	4.7%	1.8%	0.0%	6.5%
Specialist	113	125	0	238	18.9%	20.9%	0.0%	39.8%
Senior	24	142	1	167	4.0%	23.7%	0.2%	27.9%
Expert	0	17	1	18	0.0%	2.8%	0.2%	3.0%
Lead	2	39	0	41	0.0%	6.5%	0.0%	6.9%
Manager	1	43	0	44	0.0%	7.2%	0.0%	7.4%
Director	0	49	2	51	0.0%	8.2%	0.3%	8.5%
Total:	168	426	4	598	28.1%	71.2%	0.7%	100.0%

CD PROJEKT Group	Number and percentage of employees in each group in relation to the total number of employees at the organization by gender					
	Women	Men	Total	Women	Men	Total
Junior	25	14	39	4.2%	2.3%	6.5%
Specialist	107	131	238	17.9%	21.9%	39.8%
Senior	81	86	167	13.5%	14.4%	27.9%
Expert	9	9	18	1.5%	1.5%	3.0%
Lead	7	34	41	1.2%	5.7%	6.9%
Manager	14	30	44	2.3%	5.0%	7.4%
Director	13	38	51	2.2%	6.4%	8.5%
Total:	256	342	598	42.8%	57.2%	100.0%



CD PROJEKT Group – employment by type of work performed

CD PROJEKT Group	Developers	Publishing	Backoffice	Total
2023	737	198	233	1168
2022	837	226	229	1292
2021	766	221	209	1196
2020	768	231	178	1177

As of the end of each year; all forms of employment; the table includes the following companies: CD PROJEKT S.A., GOG Sp z o.o. (these two companies together employ the 1 093 people reported under GRI 2-7 and GRI 2-8), CD PROJEKT RED Inc., CD PROJEKT SILVER Inc., CD PROJEKT RED Vancouver and The Molasses Flood LLC.

The Publishing division includes teams responsible, among others, for marketing and PR, Business Development, Customer Relations and Game Releases.

Employment figures for CD PROJEKT RED dev studios

Developers employed at CD PROJEKT RED studio	CD PROJEKT S. A.				CD PROJEKT RED Vancouver	CD PROJEKT RED Inc.	Total
	Warsaw	Kraków	Wrocław	Place of work outside Poland			
2023	470	79	43	28	28	5	653
2022	520	84	40	21	31	0	696

As of the end of each year; figures correspond to the number of persons employed regardless of contract type.

⁵⁷https://en.parp.gov.pl/storage/publications/pdf/The_Game_Industry_Poland_2023_12_07.pdf

CD PROJEKT Group managerial staff by gender

CD PROJEKT Group	2023	
	Number	%
Women	38	24%
Men	119	76%
Total	157	100%

At year-end; positions included: VP, Director, Head, Manager, Lead.

Share of women in the total number of people employed at CD PROJEKT compared to the gamedev industry in Poland in 2021-2023

	31.12.2023	31.12.2022	31.12.2021
Women	31%	32%	29%
Average share of women in the gamedev industry in Poland ⁵⁷	24%	25%	26%



CD PROJEKT Group environmental indicators

[GRI 302-1] Energy consumption within the organization

Energy source	2023		2022		2021	
	GJ	%	GJ	%	GJ	%
Electricity	8236	60.7%	6981	61.2%	6287	56.0%
Heat	4903	36.1%	4050	35.5%	4526	39.9%
Gasoline	386	2.8%	356	3.1%	390	3.4%
Diesel	50	0.4%	27	0.2%	137	1.2%
Total energy consumption	13575	100.0%	11414	100.0%	11340	100.0%
Renewable sources:	392	2.9%	334	2.9%	343	3.0%
Non-renewable sources:	13183	97.1%	11080	97.1%	10997	97.0%

All types of energy sources consumed by the CD PROJEKT Group are listed. In 2021 - 2023, process steam and cooling were not used. The amount of energy from renewable sources is equal to the amount of electricity produced by the company’s own installation of photovoltaic panels at the CD PROJEKT campus in Warsaw, used entirely by CD PROJEKT. The amount of electricity consumed by the CD PROJEKT Group is the sum of the amount of energy purchased from external suppliers and that produced by the Company’s own renewable energy installation.

Energy consumption was converted to values in GJ, and the following assumptions were used for the conversion:

- for electricity, a constant conversion rate of GJ/kWh was used, where 1kWh = 0.0036 GJ
- for gasoline, a rate of 44.3 GJ/t was used (source: study by KOBIZE: “Calorific values (WO) and CO₂ emission factors (EC) in 2020 for reporting under the Emission Trading Scheme for 2023”)
- for diesel fuel, a rate of 43 GJ/t was used (source: KOBiZE study: “Calorific values (WO) and CO₂ emission factors (EC) in 2020 for reporting under the Emission Allowance Trading Scheme for the year 2023”)



[GRI 303-3] Water withdrawal

	2023	2022	2021
Water withdrawal [m³]	7252	6040	3715
Quantity used/discharged [m³]	7065	5857	3654

The reported data is drawn from invoices received from the Municipal Water Supply and Sewage Company in Warsaw, and settlement sheets submitted by managers of our Kraków and Wrocław branches. Invoices are issued on the basis of meter readings performed at Company offices. According to the World Resources Institute, Poland does not currently face elevated water stress.

[GRI 305-1] Direct (Scope 1) GHG emissions

Direct (Scope 1) GHG emissions [tCO ₂ e]	2023	2022	2021
Consumption of petrol by own fleet	24.4	23.4	26.0
Consumption of diesel by own fleet and generator station	3.5	1.9	9.4
Total direct GHG emissions (fuel consumption)	27.9	25.3	35.4

Emissions outside the scopes were: 1.37 tCO₂e in 2021, 0.98 tCO₂e in 2022 and 1.45 tCO₂e in 2023.

[305-2] Energy indirect (Scope 2) GHG emissions

Indirect emissions	Indirect GHG emissions [tCO ₂ e, location-based]			Indirect GHG emissions [tCO ₂ e, market-based]		
	2023	2022	2021	2023	2022	2021
Indirect emissions of GHGs from electricity	1418	1230	1077	1448	1272	1218
Indirect emissions of GHGs from heating	493	414	446	493	414	446
Total indirect emissions	1911	1644	1523	1941	1686	1664



[GRI 305-4] Intensity of greenhouse gas emissions

	Unit	2023	2022	2021
Emissions (Scope 1 and 2) per m ² of space used (location-based)	tCO ₂ e/m ²	0.11	0.12	0.12
Emissions (Scope 1 and 2) per m ² of space used (market-based)		0.11	0.13	0.13
Emissions (Scope 1 and 2) per employee (location-based)	tCO ₂ e/person	1.84	1.44	1.39
Emissions (Scope 1 and 2) per employee (market-based)		1.87	1.47	1.52

[GRI 306-3] Waste generated

Type of waste	Waste weight [t]			Method of treatment
	2023	2022	2021	
Hazardous waste	1.16	0.69	0.25	processing
Non-hazardous waste	9.53	7.59	10.25	processing
Total	10.69	8.28	10.5	

All waste that could not be avoided is segregated in accordance with applicable laws, and directed to disposal by specialized entities who hold the required permits concerning management of specific types of waste.



Attachment 4. GRI Index

Statement of application	CD PROJEKT Group prepared the Report for the period between 1 January and 31 December 2023 in accordance with GRI Standards 2021.
GRI 1 Standard Applied	GRI 1: Foundation
Applicable GRI sector standard	A GRI sector standard for the electronic entertainment industry has not yet been published.

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2-3	Reporting period, frequency and contact point	6, 8
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* Indicators covered by an independent assurance service performed by Deloitte Assurance Polska spółka z ograniczoną odpowiedzialnością sp. k. (formerly: Deloitte Assurance sp. z o.o.)



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* Indicators covered by an independent assurance service performed by Deloitte Assurance Polska spółka z ograniczoną odpowiedzialnością sp. k. (formerly: Deloitte Assurance sp. z o.o.)



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* Indicators covered by an independent assurance service performed by Deloitte Assurance Polska spółka z ograniczoną odpowiedzialnością sp. k. (formerly: Deloitte Assurance sp. z o.o.)



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* Indicators covered by an independent assurance service performed by Deloitte Assurance Polska spółka z ograniczoną odpowiedzialnością sp. k. (formerly: Deloitte Assurance sp. z o.o.)



Number	Disclosure	Page/comment
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Customer privacy 2016		
418-1*	Substantiated complaints concerning breaches of customer privacy and losses of customer data	79

* Indicators covered by an independent assurance service performed by Deloitte Assurance Polska spółka z ograniczoną odpowiedzialnością sp. k. (formerly: Deloitte Assurance sp. z o.o.)



Attachment 5. SASB disclosure

Sustainability Accounting Standards Board (SASB) – Software & IT Services

TOPIC	ACCOUNTING METRIC	CODE	DISCLOSURE
Environmental Footprint of Hardware Infrastructure	(1) Total energy consumed (2) percentage grid electricity (3) percentage renewable	TC-SI-130a.1	(1) 13575 GJ (2) 60.7 % (3) 2.9 %
	(1) Total water withdrawn (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	TC-SI-130a.2	(1) 7252 m³ (2) 7065 m³; 0%
	Discussion of the integration of environmental considerations into strategic planning for data center needs	TC-SI-130a.3	Much of the service is provided from our own servers, located at CD PROJEKT's headquarters in Warsaw. Our computing resources are virtualized and/or containerized, thus ensuring a high resource utilization rate. In addition, some services are also implemented using public cloud providers, including AWS and Google Cloud Platform. Cloud solutions are taken into account when planning new projects. Public cloud providers completely or significantly use renewable energy or plan to cover energy needs with 100% renewable energy in the coming years. The company's own servers are powered by electricity from the energy supplier for the CD PROJEKT campus in Warsaw.
Data Privacy & Freedom of Expression	Description of policies and practices relating to behavioral advertising and user privacy	TC-SI-220a.1	Personal data is processed in accordance with the internal Personal Data Protection Policy and the publicly available CD PROJEKT RED Privacy Policy. There is no dedicated policy relating specifically to behavioral advertising.
	Number of users whose information is used for secondary purposes	TC-SI-220a.2	We did not consolidate data from this area in the reporting period.
	Total amount of monetary losses as a result of legal proceedings associated with user privacy	TC-SI-220a.3	0 PLN – we did not incur such losses in the reporting period.



TOPIC	ACCOUNTING METRIC	CODE	DISCLOSURE
Data Privacy & Freedom of Expression	(1) Number of law enforcement requests for user information (2) number of users whose information was requested (3) percentage resulting in disclosure	TC-SI-220a.4	During the reporting period, we received one law enforcement request for user information. The request contained payment card transaction data from which it was not possible to identify the personal information of the person making the payment.
	List of countries where core products or services are subject to government required monitoring, blocking, content filtering, or censoring	TC-SI-220a.5	We did not consolidate data from this area in the reporting period.
Data Security	(1) Number of data breaches (2) percentage that are personal data breaches (3) number of users affected	TC-SI-230a.1	We did not record any leaks of customer data during the reporting period.
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	TC-SI-230a.2	As part of the strategic risk management process, the following risk was identified: cybersecurity risk related to the threat of data leakage, loss or unauthorized modification. The risk was analyzed in accordance with the applicable methodology. Risk factors were identified and described. A treatment plan grouped into programs with a series of mitigation actions was developed. A description of strategic risks can be found in the CD PROJEKT Group Activity Report. Cybersecurity risks involve potential exposure to loss or damage resulting from the fact that data is processed in information or communication systems. Cybersecurity risks go beyond data corruption, leakage or destruction, and include theft of intellectual property, loss of productivity and loss of reputation. The consequences of a potential breach can range from brand damage and revenue loss to stock price reductions. Also directly related to the consequences are the costs of investigations, remedies, fraud, litigation and possibly related penalties.
Recruiting & Managing a Global, Diverse & Skilled Workforce	Percentage of employees that are: (1) foreign nationals (2) located offshore	TC-SI-330a.1	(1) 18% (2) 4%



TOPIC	ACCOUNTING METRIC	CODE	DISCLOSURE
Recruiting & Managing a Global, Diverse & Skilled Workforce	Employee engagement as a percentage	TC-SI-330a.2	72% - the score of the engagement survey conducted with the Culture Amp tool.
	Percentage of gender and racial/ethnic group representation for (1) management (2) technical staff (3) all other employees	TC-SI-330a.3	(1) women 24%, men 76%; Poles 87%, foreigners 13% (2) women 21%, men 79%; Poles 75%, foreigners 25% (3) women 54%, men 46%; Poles 90%, foreigners 10%
Intellectual Property Protection & Competitive Behaviour	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations	TC-SI-520a.1	0 PLN - we did not incur such losses in the reporting period.
Managing Systemic Risks from Technology Disruptions	Number of (1) performance issues and (2) service disruptions (3) total customer downtime	TC-SI-550a.1	n/a - CD PROJEKT does not provide customer services based on cloud solutions.
	Description of business continuity risks related to disruptions of operations	TC-SI-550a.2	As part of the strategic risk management process, the following risk was identified: Risk of unavailability of IT infrastructure or services. The risk was analyzed in accordance with the applicable methodology. Risk factors were identified and described. A treatment plan grouped into programs with a series of mitigation actions was developed. A description of strategic risks can be found in the CD PROJEKT Group Activity Report. The identified risk relates to loss of access to IT infrastructure or business applications supporting critical business processes at CD PROJEKT as a result of an unforeseen event. This risk represents potential exposure to loss or damage resulting from an interruption in the availability of CD PROJEKT's ICT systems. The risk goes beyond physical or logical damage of infrastructure components or data processing systems, and also includes loss of physical access to server rooms and other data processing locations.



Attachment 6. TCFD recommendations

TCFD recommendations		Page
Governance Disclose the organization’s governance around climate-related risks and opportunities.	Describe the board’s oversight of climate-related risks and opportunities.	67
	Describe management’s role in assessing and managing climate-related risks and opportunities.	67
Strategy Disclose the actual and potential impacts of climate-related risks and opportunities on the organization’s businesses, strategy, and financial planning where such information is material.	Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.	65
	Describe the impact of climate-related risks and opportunities on the organization’s businesses, strategy, and financial planning.	66-67
	Describe the resilience of the organization’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	67
Risk Management Disclose how the organization identifies, assesses, and manages climate-related risks.	Describe the organization’s processes for identifying and assessing climate-related risks.	63
	Describe the organization’s processes for managing climate-related risks.	66-67
	Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization’s overall risk management.	67
Metrics and Targets Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.	Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.	67
	Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks.	53-58
	Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.	52



This CD PROJEKT Group Sustainability Report for 2023 was approved for publication by the Management Board of CD PROJEKT S.A. on 28 March 2024 and signed on 28 March 2024, pursuant to Art. 49b section 9, Art. 52 section 3 item 2 and Art. 55 section 2c of the Accounting Act of 29 September 1994 (JL 2023, item 120, as amended).



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Member of the Board



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Joint Chief Executive Officer
Member of the Board



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