

ETHICS AND COMPLIANCE SYSTEM

We operate ethically and we are developing the compliance system

In the Agora Group, we are committed to the highest ethical standards and stress the importance of acting in accordance with applicable laws, internal regulations and external codes with which we are required to comply. Therefore, we have been consistently developing the **compliance system** since 2018.

Currently, the compliance system consists of the following elements:

- **internal regulations**, in particular the “**Agora Code of Ethics**”;
- **the compliance officer** and the compliance team;
- **periodic assessment** of a compliance risk, as well assessment and update of the implemented compliance system;
- **a whistleblowing system**;
- **Compliance Risk Charter**, i.e. monitoring of compliance of activities in key business areas;
- **training and communication**.

“Agora Code of Ethics”

The “**Agora Code of Ethics**” is an internal document addressed to all employees and collaborators of the Company. It indicates what attitudes and rules of conduct are expected at Agora and what are deemed by the company as inappropriate or unacceptable. This condensed set of guidelines and values is an expression of a responsible and transparent approach in the following seven areas, which are also titles of the “Code of Ethics” chapters:



1. **DIVERSITY IN THE WORKPLACE** – describes the main workplace principles: cooperation, equal treatment of all employees and collaborators as well as mutual respect;

2. FAIR EXTERNAL RELATIONS – specifies what constitutes fair external relations and high ethical standards in dealing with clients, suppliers and contractors;

3. RELATIONSHIPS TRANSPARENCY – covers transparency in the workplace, including in relations with business partners, suppliers and contractors, as well as employment in Agora in the context of other professional and political activities;

4. COMPLIANCE AND ANTI-CORRUPTION – indicates methods for preventing fraud and corruption in the company;

5. COMMITMENT TO THE REPUTATION OF AGORA – outlines the principles of communication and presentation of information about the company and proper commitment to its reputation;

6. INFORMATION SECURITY – outlines the handling of confidential information, trade secrets and personal data protection.

The “Agora Code of Ethics” applies to all employees, collaborators and officers of Agora S.A., regardless of their role or position held in the company. The document contains in particular:

- the principles to be followed by employees and collaborators in their relations with all of the company's stakeholders;
- a list of key documents governing specific issues in detail;
- a whistleblowing scheme in force in Agora;
- contact information of persons who can help with ethics-related issues;
- prompts and a glossary of terms.

Training on the “Agora Code of Ethics” is available on Agora’s internal training platform and is mandatory for all employees.

The Management Board of Agora S.A. recommended that all companies in the Agora Group adopt the “Code of Ethics”.

Whistleblowing system

Agora has a **whistleblowing system** in place. Its implementation is an expression of the company's commitment to promoting a culture supporting behaviour that is ethical, consistent with laws, internal procedures and regulations, as well as external codes adopted by the company. The aim of the system is to provide secure channels for reporting unethical activities or practices that are contrary to applicable laws or the company’s rules that have been observed by employees. It also provides support in the case of questions or concerns that may arise.

The following whistleblowing channels are available:

- **internal** – with confidentiality maintained (contact with the compliance officer or the anti-discrimination and anti-mobbing representative),

- **external** – with confidentiality and anonymity maintained (contact via Linia Etyki).

Every notification, question or suggestion submitted to **Linia Etyki** is forwarded to substantive advisors, who keep in touch with the whistleblower. Linia Etyki also supports Agora in resolving cases.

In 2020, a total of **5 notifications** were received within the framework of Linia Etyki. Some of them required investigation of the case and examination of the notification in terms of possible irregularities, while others were questions that were answered. At the same time, the notifications and questions were forwarded directly to Agora's compliance officer and the anti-discrimination and anti-mobbing representative. None of the notifications concerned violations of anti-discrimination or anti-corruption regulations.