

OTHER INFORMATION

FINES OR NON-FINANCIAL PENALTIES

In 2019 w none of the entities of Agora Capital Group was subject to fines for:

- infringement of customer privacy or loss of personal data;
- non-compliance with the law and regulations or self-imposed codes regulating marketing communication, including advertising, promotion and sponsoring;
- non-compliance with the law and regulations or self-imposed codes relevant to health impact of products and services in any impact category or stage, by type of effect. Agora Group did not sell forbidden or controversial products in 2019.

In 2019 the entities of Agora Capital Group:

- did not record incidents of corruption,
- were not subject to any legal actions for anti-competitive behaviour, anti-trust, monopoly practices or their outcomes,
- were not subject to any significant fines or non-monetary sanctions for non-compliance with labour law,
- did not record incidents of breach of labour laws and was not subject to a penalty or fine resulting from a lost case against an employee or collaborator (i.e. penalty became final and the fine payable),
- not subject to any significant fines or non-monetary sanctions for non-compliance with environmental law and/or regulations.

CUSTOMER PRIVACY AND PROTECTION OF PERSONAL DATA

Two incidents occurred in 2019 in terms of infringement of customer privacy and loss of personal data. Both were caused by external factors and were reported to PDPO. In both cases Agora instantly took measures to minimize risk of breach of customer privacy or unauthorised access to data.

Agora received three formal letters from Personal Data Protection Office urging Agora S.A. to provide explanations. Agora's timely response proved that in the relevant cases personal data was handled correctly.

In 2019 one incident was recorded in Helios S.A. resulting in a report sent PDPO. The incident was caused by an error of an employee. Measures taken to minimize the risk of confidentiality breach or unauthorised access to data were approved by PDPO.

AGORA Report 2019

In 2019 one incident was reported in which one of former employees of Agora exceeded his competence and could gain access to personal information of his colleagues. The investigation that ensued included analysis of risks. All employees potentially threatened by the situation were invited to a meeting and preventive measures were deployed.

Since 2015 PDPO has been investigating a case of complaint concerning the processing of personal data included in comments on an internet forum referring to the claimant. In 2019 Agora received a formal letter from PDPO stating that enough evidence had been collected for a conclusive ruling in the case. The ruling by the President of PDPO was not announced by 31 December 2019.

RESPONSIBLES FOR PRODUCTS AND SERVICES

In 2019 Foodio Concept underwent an inspection of State Trade Inspectorate (PIH) resulting in fine. No other penalties or fines were incurred by entities of Agora Group in 2019 for breaches of law or other regulations in the delivery and use of products and services.

W 2019 r. nie stwierdzono w spółkach Grupy Agora innych kar i sankcji z tytułu niezgodności z prawem i regulacjami dotyczącymi dostarczania i użytkowania produktów i usług.

ANTI-COMPETITIVE, ANTI-TRUST, MONOPOLY PRACTICES

In 2019 no cases of anti-competitive behaviour, or their outcomes were recorded. In March 2019 Office of Competition and Consumer Protection opened a formal investigation procedure regarding the sale of Eurozet. OCCP aims to establish whether Agora and SFS Ventures were under obligation to report the takeover of the publisher of Radio Zet.

Office of Competition and Consumer Protection (UOKiK - Urząd Ochrony Konkurencji i Konsumentów) launched phase two of the investigation regarding the acquisition of Eurozet by Agora. The case requires a market survey to be conducted. Application for the permission to purchase was submitted to OCCP on 28 October. The decision to initiate phase two of the procedure does not prejudice the final decision.

In 2020 OCCP announced that opening a formal investigation procedure regarding the Resolution of the City of Warsaw Council City Landscape Resolution on the rules and terms of installing street furniture and fences. According to the information posted on the website, the investigation is due to the potential monopoly of AMS S.A. that would eliminate from the market a number of advertising industry players.

The proceedings refer to the case and are not aimed at specified entities. OCCP shall investigate the OOH advertising market in Warsaw in order to understand its mechanisms, market shares of different players and economic effects of legal regulations. The office does not exclude further actions, including anti-monopoly proceedings, in the event of confirmed breach of the act on competition and consumer protection.

ADMINISTRATIVE AND COURT-ADMINISTRATIVE PROCEEDINGS

AGORA Report 2019

Due to the nature of Agora's business as a newspaper publisher, the company is involved in a number of civil cases brought in relation to an infringement of the right to protection of personality in press publications. Agora is also a party to administrative and court-administrative proceedings in connection with complaints about the refusal by the company to disclose personal data of users of websites of the company to entities other than authorized bodies.

The company is also party to cases pursuant to complaints filed against the decisions of prosecutor's office or court related to providing access to personal data of users who comment press articles on Wyborcza.pl. Agora is party to administrative and court-administrative proceedings in connection with complaints about the refusal by the company to disclose personal data of users of websites of the company to entities other than authorized bodies.

In 2019 a civil case against Agora was closed in which the plaintiff accused the company of infringement of personality rights by publishing the plaintiff's comments on a discussion forum. The charges were dropped.