

AGORA COMPLIANCE SYSTEM

In 2019 Agora started developing a compliance system.

One of the measures taken by Agora was analysis of gaps in the compliance system and develop recommendations for Agora Group Compliance System.

The project included regulatory compliance (compliance with the law) as well as compliance with self-imposed codes (good practices and industry standards). Analysis of key areas of operations was conducted for compliance risks, current procedures and internal regulations were reviewed to identify gaps, and therefore compare the system currently in place with legal requirements and good practices and to develop recommendations. The document was formulated by a multi-sectional compliance team (Legal Department, Compliance Officer, Corporate Communications, Management Board) and representatives of the entities of Agora Group.

In 2019 Agora began developing a compliance system for the entire Agora Group and indicated the following priorities: introduce Policy of Accepting and Offering Gifts and Other Benefits in Agora S.A., controls / search protocol training, implement AML procedure, introduce compliance console and develop communication systems for compliance projects.

In 2020 Agora will continue developing its compliance system, including the following:

- Internal regulations (Agora Code of Ethics, Compliance Policy, internal procedures and manuals)
- Compliance Officer and Compliance Team
- Regular evaluation of non-compliance risk and updates of implemented compliance system
- Whistleblowing system for reporting and processing reports of corruption and misconduct
- Compliance Risks Charter, compliance monitoring in key areas of business operations
- Training and communications

PROCEDURES FOR PREVENTING MONEY LAUNDERING AND FINANCING TERRORISM

In 2019 Management Board of Agora S.A. adopted Procedure for Preventing Money Laundering and Financing Terrorism. The document determines rules and procedures for preventing money laundering and financing terrorism. This way Agora executes its obligations under the relevant laws. The procedures are observed by all participants of the activities involved in providing accounting services for clients. The procedures are

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mandatory and apply to relations with all clients. Every employee and collaborator is obliged to know the document. To this end Agora organized training and information meetings for our employees.