

WHISTLEBLOWING SYSTEM

As a part of the ethics system Agora introduced *Whistleblowing System Protocol in Agora S.A. and Whistleblowing Processing Protocol*. The documents specify that every report is approached as confidential and the whistleblower is provided special protection, as well as that every report is important and shall be processed, and addressed as quickly as possible. However, in especially sensitive cases the processing might last 30 or more days.

The system includes internal and external channels for submitting questions and reporting on the misconduct of employees or collaborators. The system includes internal and external channels for submitting questions and reporting on the misconduct of employees or collaborators.

The following channels and forms of reporting cases related to workplace discrimination and mobbing are currently available in Agora:

- internal – confidential:
 - contacting the in-house anti-discrimination and anti-mobbing officer (e-mail)
 - contacting Agora's Compliance Officer (e-mail [etyka\[@\]agora.pl](mailto:etyka[@]agora.pl), phonecall or personal contact)
- external – confidential and anonymous
 - contacting an external Ethics Line (online platform, e-mail, telephone available between 7:00 and 18:00)

Any report, question or suggestion, submitted via the portal, e-mail or Ethics Line, reaches relevant experts who remain in contact with the whistleblower. The system ensures the whistleblower's anonymity and the correspondence is encoded and only the experts of Ethics Line can access it. The information can be passed to Agora's Compliance Officer upon the whistleblower's express permission. Ethics Line provides assistance to Agora in solving reported cases.

| 12

number of cases registered through Ethics Line In
2019

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suggestions

A large red vertical bar is positioned to the left of the number 3.

cases of misconduct

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cases reported through Ethics Line in 2018

Twelve cases were registered via the Ethics Line most were suggestions (nine) and three were reports of misconduct in 2019. Some were reports that required verification and checking as potential cases of corruption, others were questions to which relevant answers were provided. Simultaneously, each case was directed to Agora's Compliance Officer and Anti-Discrimination and Anti-Mobbing (5 reports). Reports relevant to workplace relations were described in the human rights and the workplace section of this report (five cases in

17

number of workplace relations cases reported and processed in 2019

AGORA CODE OF ETHICS COMMUNICATIONS AND EDUCATION FOR THE EMPLOYEES

Communications about Agora Code of Ethics and ethics system are intended to promote the principles and values adopted by the organization among the employees, collaborators and contractors or Agora. Communications are carried through various channels and forms: e-mailing, posters displayed in the workplace, newsletters and a dedicated sections in company intranet, training and non-standard activities.

New employees are introduced to Agora Code of Ethics at Welcome to Agora orientation training, 114 new employees in 2019.

Agora Code of Ethics and Whistleblowing System were also the subject of meetings and workshops for managers during the strategic session as well as Council of Directors and other meetings and workshops of top level managers in the organization.

2020 plans include mandatory e-learning course covering also Agora Code of Ethics, addressed to all employees.