

APPROACH TO MANAGEMENT

In 2018 Agora S.A. adopted a comprehensive system of ethics including Agora Code of Ethics, and implemented an internal whistleblowing protocol. As a part of these proceedings Agora conducted an ethics audit and introduced a confidential whistleblowing system and the function of Compliance Officer.

In 2019 a gap in the compliance system was identified, recommendations were developed and further steps were suggested and the process of building a comprehensive compliance system for Agora Group was continued.

GOALS IN 2019

In 2019 Agora adopted the following goals:

Area	Goals	Progress	Comments
 ETHICS AND COMPLIANCE	Introduce a comprehensive compliance system in Agora Group	In progress	Started developing compliance system, to be continued into 2020
	Continue training and communications addressed to all employees of Agora Group	In progress	Communications implemented. 2020 training scheme developed
	Implement Policy of Accepting and Offering Gifts and Other Benefits in Agora S.A.	Completed	Policy adopted in December 2019, outreach and training in January and February 2020

GOALS IN 2020

In 2020 Agora adopted the following goals:

Area	Goals
 ETHICS AND COMPLIANCE	Continue developing and introduction of Agora Group compliance system. Introduce Compliance Risks Charter as a key tool for managing compliance and establish compliance structures in Agora entities
	Deliver e-learning ethics training addressed to all employees
	Communicate and educate employees about Policy of Accepting and Offering Gifts and Other Benefits in Agora S.A.